

Pre-Submission Draft Local Plan Partial Update – full copies of representations received (F to K)

Contents

Facer, M. G and Davies, G.....	3
Foudry Properties	5
Foxon, Alex.....	15
Fulbrook, Sara	17
Fyans, Bernard	20
Gamester, Stan.....	22
Gladman	25
Goodchild, Helen	104
Gray, Susan.....	108
Haynes, Trevor and Alison.....	112
Hazelton, Mark.....	114
Hicks, Steve.....	117
Historic England.....	125
Home Builders Federation (HBF)	140
Iwaschkin, Anna.....	153
Jenks, Katie	155
John Lewis Partnership.....	157
Jones, Sarah.....	193
Keep Kentwood Green.....	195
Kemp, Helen	201
Kidmore End Parish Council	203

Facer, M. G and Davies, G

From: [REDACTED]
Sent: 18 December 2024 16:51
To: Planning Policy
Subject: RBC Partial Update to Local Plan (Regulation19)

Warning!
For the attention of
RBC, BFfC Staff and Councillors

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Dear Sir or Madam,

I and my partner Miss Davies are residents of [redacted]. I am writing to object in the strongest possible terms to the Reading Borough Council Local Plan (Regulation 19) and its implications for the reserved land at Kentwood Hill (WR3s) and Armour Hill (WR3t). This decision is totally unsound as any development would cause harm to the numerous protected species of wildlife living there.

The whole of this land should be granted Local Green Space status, as it all satisfies the criteria for listing as such.

Also, the space is probably unsuitable for building on, due to the very real possibility of unstable ground, as evinced by the recent collapses of roads in Westwood Road and Dudley close.

Please review this rash decision.

Yours sincerely,

Mr. M. G. Facer and Miss G. Davies



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Foudry Properties

Representations to the Reading Borough Local Plan Partial Update

Regulation 19 (Pre-Submission) Consultation
(November 2024)

Foudry Properties Ltd



Contents

1.	Introduction to Representations	1
2.	Policy SR1: Island Road Major Opportunity Area	2
3.	Policy SR1c: Island Road A33 Frontage	4
4.	Conclusion	6

1. Introduction to Representations

1.1. Introduction

- 1.1.1. These representations have been prepared on behalf of Foudry Property Ltd (Foudry) in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough Local Plan Partial Update (LPPU).
- 1.1.2. Foudry are in control of the 'Island Road A33 Frontage Site' (The Site) which is allocated for commercial development under draft LPPU Policy SR1c.
- 1.1.3. The Site comprises brownfield land in a highly sustainable location, which provides an opportunity to deliver a range of new employment generating development in an area that experiences a concentration of unemployment and low skills. The allocation of the site and its redevelopment will therefore provide substantial economic benefits to Reading Borough and make a significant contribution towards meeting its employment needs in the period to 2041.
- 1.1.4. Notwithstanding Foudry's support for the allocation of the site, a number of changes are recommended to Policies SR1 and SR1c in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023).

1.2. Report Structure

- 1.2.1. These representations are structured as follows, based on relevant draft policies contained within the Regulation 19 Pre-Submission consultation document (November 2024) and the supporting evidence base.
- 1.2.2. Responses are set out under each relevant draft policy with proposed changes set out as necessary to ensure the soundness of the Plan:
 - Policy SR1: Island Road Major Opportunity Area;
 - Policy SR1c: Island Road A33 Frontage;

2. Policy SR1: Island Road Major Opportunity Area

2.1. Introduction

- 2.1.1. Section 6.3 of the LPPU sets out policies for South Reading and provides a Vision for the Island Road Major Opportunity Area as follows:

“Vision: The Island Road area will be a major new location for industrial and warehouse development providing jobs in one of the areas of greatest need.”

- 2.1.2. Policy SR1 is the Strategic Policy for the Island Road Major Opportunity Area (MOA) in which the Site is located. The Policy is carried forward from the Adopted Reading Borough Local Plan (4th November 2019), with changes made to its wording, set out in the tracked changes version of the LPPU as follows:

“Development in the Island Road Major Opportunity Area will provide ~~approximately 120,000 to 150,000 sqm of~~ new business space comprising mainly industrial ~~and~~ warehouse and research and development uses, with some supporting office uses.”

- 2.1.3. The text accompanying Policy SR1, at paragraph 6.3.1, is also changed compared with the Adopted Local Plan with the addition of the following new text:

“The adopted Central and Eastern Berkshire Minerals and Waste Plan identifies this area as potentially suitable for small scale waste activities requiring enclosed industrial premises, which can be included within development of the site.”

2.2. Response

- 2.2.1. The identification of MOA as a location for new business space across a range of different uses is consistent with the Spatial Strategy for the Adopted Local Plan, as carried forward into the LPPU. It is also consistent with the NPPF (2023), particularly Chapter 6: ‘Building a strong, competitive economy’.
- 2.2.2. The Reading Commercial Needs Assessment, Volume A – Draft Report (November 2024), confirms the future employment floorspace and land requirements of the LPPU in the period to 2041, as being between 227,917 sqm (without allowance for loss, replacement and margin) to 403870 sqm (allowing for loss, replacement and margin) of employment floorspace in Reading Borough, equivalent to between 43.7 ha to 80.0ha of employment land (paragraph 4.18).
- 2.2.3. The delivery of new business space within the MOA, in particular at the Site in accordance with Policy SR1c, will therefore contribute towards addressing the employment needs of Reading Borough in a highly sustainable location. Reading Green Park Station is less than 1,500m to the southwest of the Site, accessible on foot, bicycle or by bus. The A33 corridor, immediately to the east of the site provides direct access central Reading and Reading railway station via bus or a number of well-established traffic free cycle routes.

- 2.2.4. The site itself is previously developed and is vacant. The allocation of the site for business purposes, as anticipated by Policies SR1 and SR1c, will therefore bring underutilised brownfield land back into productive use, and accordingly represent the most efficient use of urban land.
- 2.2.5. The Vision for the MOA and the provisions of Policy SR1 are therefore supported, although it is noted that the new text concerning provision for waste activities at paragraph 6.3.1 of the supporting text has not been carried forward into the wording of Policy SR1 itself or its sub areas, including SR1c. Without reference to this specific use in the policy, there will be uncertainty about its acceptability in the MOA, making Policy SR1 ineffective.
- 2.3. **Summary**

With reference to paragraph 35 of the NPPF 2023, Policy SR1 as currently worded does not meet the tests of soundness.

Accordingly, in order to ensure the soundness of the Plan, it is important that the Council includes waste activities requiring enclosed industrial premises in the list of acceptable uses within the MOA, within the main body of Policy SR1.

3. Policy SR1c: Island Road A33 Frontage

3.1. Introduction

- 3.1.1. Figure 6.2 of the LPPU illustrates the MOA Area Strategy in the form of a diagram, with sub area c (the Site) located on its eastern side. The corresponding policy in the LPPU is Policy SR1c, which is again carried forward from the adopted Local Plan.
- 3.1.2. On behalf of Foudry we can confirm that site SR1c is available and deliverable as a site for a range of commercial uses in accordance with Policy SR1c. As noted in the supporting text, at paragraph 6.3.4 planning permission already exists for some 70,000 sqm of office floorspace at the site. This permission is extant and could be implemented and accordingly provides a basis for considering transport impacts for alternative employment uses.
- 3.1.3. Policy SR1c does however allow for commercial uses other than offices at the Site, including industrial, warehouse or research and development, the latter being added to the policy as an acceptable use consistent with changes made to Policy SR1.
- 3.1.4. Policy SR1 confirms that the indicative potential for the site is between 25,000 and 38,000 sqm of industrial / warehouse / R&D uses, or alternative commercial uses. An addition has been made to the policy to require tree planting to enhance the A33 as a treed corridor.
- 3.1.5. In terms of alternative commercial uses, as noted earlier in these representations, paragraph 6.3.1 of the supporting text identifies a need for small scale waste activities requiring enclosed industrial premises in the MOA. In addition, paragraph 6.3.4 of the supporting text also identifies opportunities for car showrooms or trade counter uses. Reference is also made to temporary uses, where it would not affect the long-term development potential of the site.

3.2. Response

- 3.2.1. The continued allocation of the Site under Policy SR1c is welcomed, including the addition of research and development alongside industrial and warehousing uses. The range of commercial uses proposed by the policy is consistent with proposals being developed by Foudry. However, as with Policy SR1, it is necessary to list within the main body of Policy SR1c the other alternative uses that will be acceptable at the site, including small scale waste recycling facilities requiring enclosed industrial premises and car showrooms, trade counter uses and also temporary uses that will not prevent the development of the Site. Without reference to these uses in the policy itself, there will be uncertainty about their acceptability, making Policy SR1c ineffective.
- 3.2.2. The increase in the indicative capacity of the site from 32,000 to 38,000 sqm is also welcomed. However, site capacity work completed by Foudry based on a traditional multi-unit industrial and warehousing scheme indicates that the capacity of the Site will be of at least 44,000 sqm. It is recommended therefore that the indicative capacity be changed to 32,000 to 45,000 sqm.

3.2.3. The additional requirement introduced by the LPPU for tree planting to be incorporated into the A33 frontage is acceptable in principle, although it should be noted that the number and positioning of trees will need to be carefully considered in the context of maintaining visibility splays for points of access and provision of land for bus rapid transport should this be required.

3.2.4. Accordingly, it is recommended that the following changes are made to Policy SR1c in order to ensure that it is effective.

3.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy SR1c as currently worded does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy SR1c in order to ensure the soundness of the Plan.

SR1c, ISLAND ROAD A33 FRONTAGE:

This site will be developed for commercial use. Proposals for industrial, or warehouse or research and development use will therefore be appropriate, as will offices in line with the existing permission. Related commercial uses including small scale waste recycling requiring enclosed industrial premises, car showrooms and trade counter uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres. Temporary uses that would not effect the long term development potential of the site may also be appropriate prior to the redevelopment of the site. The frontage to the A33 will be of high visual and incorporate tree planting to enhance the A33 as a treed corridor as far as practicable taking account of highways safety and highways infrastructure requirements, and an alignment for a mass bus rapid transit route through the site in a north-south direction will be a requirement.

Site size: 9.7 ha

Indicative potential: 25,000 - ~~38,000~~ 45,000 sqm of industrial/warehouse/R&D uses, or alternative commercial uses.

4. Conclusion

4.1. Summary

- 4.1.1. These representations have been prepared on behalf of Foudry Properties Ltd in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough LPPU. Responses have been provided based on Policies SR1 and SR1c and supporting text within the draft Regulation 19 draft Local Plan, as well as the supporting evidence base documents, to assist in informing the final stages of the LPPU.
- 4.1.2. Foudry are in control of the Island Road A33 Frontage site (Policy SR1c) within the Island Road Major Opportunity Area (Policy SR1) which is allocated for commercial development. The site is available and deliverable for commercial development as anticipated by Policies SR1 and SR1c.
- 4.1.3. The Site comprises brownfield land in a highly sustainable location, which provides an opportunity to deliver a range of new employment generating development in an area that experiences a concentration of unemployment and low skills. The allocation of the site and its redevelopment will therefore provide substantial economic benefits to Reading Borough and make a significant contribution towards meeting the employment need of the Borough.
- 4.1.4. Notwithstanding this, a number of changes are recommended to draft LPPU Policies SR1 and SR1c in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023).

Phil Brown

Director

+44 (0) 796 855 0302

pbrown@savills.com



Foxon, Alex

Rejwerska, Marcelina

From: alex foxon [REDACTED]
Sent: 18 December 2024 10:54
To: Planning Policy
Subject: Local green space plans

Warning ! For the attention of RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Re: RBC Partial Update to Local Plan (Regulation 19), in response to questions 15 and 75, I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. I believe that ALL the land should be granted Local Green Space status as it all satisfies the criteria.

Yours sincerely,
Alex Foxon.



Sent from my iPhone

Fulbrook, Sara

(Response from webform)

Title: Miss

First name: Sara

Last name: Fulbrook

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: all of reading

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: Cversham

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: No

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

there is very little local consultation rather than this option to rubber stamp council ideas

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

actually ask residents to input their opinions in proper localised consults

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: transport. In particular the terrible disjointed access to the bus network. Years ago we were promised that once the station had been upgraded the public space would be returned. However it has been sold off to private developers. The allocated public space is now part of a private development. The links between bus routes is dire as a disabled person who has to visit hospital a lot I find it difficult to walk to the nearest hospital stops. Most modern large towns cities have transport service hub at the station, not spread out over a large part of the train centre.s is no

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: No

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

There has been zero consultations with residents prior to the draft plan being set up either with individuals or stakeholders which lead to the disastrous 1 way system in Caversham. In particular there is a lack of crossings in Caversham that discourages active travel Peppard Road is the worst.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary: I don't feel that the voice of older or residents who rely on public transport due to lack of mobility is considered. Or that Reading is properly addressing pollution and air quality. Reading is in favour of cars over pedestrians particularly North of the river. They also fail to address any conflict between cyclists and pedestrians on shared paths

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Author name: Sara Fulbrook

Fyans, Bernard

Rejwerska, Marcelina

From: Bernard Fyans [REDACTED]
Sent: 18 December 2024 19:57
To: Planning Policy
Subject: RBC Partial Update to Local Plan (Regulation 19)

Warning!
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Dear Sirs, I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. As a local resident, I believe that ALL the land should be granted Local Green Space status as it all satisfies the criteria.

Yours sincerely, Bernard Fyans,

Gamester, Stan

Rejwerska, Marcelina

From: Stan Gamester [REDACTED]
Sent: 16 December 2024 21:27
To: Planning Policy
Cc: Stan Gamester
Subject: Local Plan Update community submissions

Warning!
For the attention of
RBC, BFfC Staff and Councillors

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Dear Planning,

I am responding to your development proposals for area WR3s and WR3t on your map, the areas between Kentwood Hill and Armour Road. I am a resident of Tilehurst and have always been concerned about the quality of the environment around me and as a keen gardener know the importance of biodiversity.

The two areas referred to have long been known as rich in flora and fauna. Although once allotments the land has been left to nature for at least three decades and has become a home for wildlife. This is rare in an urban neighbourhood. Many species of animal have been identified there and recognised as significant by CPRE England, the Badgers Trust, Rural England and BBOWt. One of the most significant factors is the presence of a large badger set in WR3s, as you know, a protected species.

Portioning the land into possible development sites either side of a patch that is designated Local Green Space and of Biodiversity Interest would, if realised, essentially kill the isolated LGS since the ecosystem and the corridor that supports it will have been turned into tarmac and brick. Animals would have very little room to roam and forage. Wildlife is dependent on land for insects, vegetation and a place to live. Parcelling the land up into ever smaller patches will endanger and possibly kill off that wildlife. It would seem this factor has been ignored in the planning process.

Therefore, to preserve the LGS and its biodiversity the whole area including WR3s, WR3t should be retained as wild green space. This would fit with another of the Council's much praised positions of being on a Climate Action A list. It also has an aspiration to giving its residents a "Healthy Environment" and "where people feel the benefits of clean air". Green spaces help to filter, oxygenate and cool air, much needed in an era of climate and environmental crisis.

Please revise the plan to suit the needs and interests of the people who actually live there now, recognise our wishes in that neighbourhood and leave the land to nature.

Kind Regards,

Stan Gamester

[REDACTED]



Gladman



Reading Borough Council Local Plan Partial Update

Pre-Submission Draft Regulation 19 Consultation

December 2024



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

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CONTENTS

1	Introduction.....	2
1.1	Context.....	2
2	Duty to Cooperate	4
3	Legal Compliance.....	7
3.1	Sustainability Appraisal	7
4	National Planning Guidance.....	9
4.1	National Planning Policy Framework	9
4.2	Written Ministerial Statements.....	11
5	Pre-submission Draft.....	12
5.1	Background.....	12
5.2	Plan Period.....	12
5.3	Housing Needs.....	12
5.4	Housing Capacity	14
5.5	Housing Delivery	16
5.6	Transport Strategy	17
5.7	Local Plan Review	18
6	Site Submission Profiles.....	19
6.1	North-East Reading	19
7	Conclusions.....	21
7.1	Summary.....	21
	Appendices	22
	Appendix 1: West Berkshire Future Housing Needs Assessment.....	22
	Appendix 2 - Land North East of Reading Vision Document.....	23

1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Reading Borough Council Pre-Submission Draft Local Plan Partial Update consultation and request to be updated on future consultations and the progress of the Local Plan.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging Reading Borough Local Plan Partial Update, having previously submitted representations on the regulation 18 consultation in January 2024.
- 1.1.3 Within the representations to the regulation 18 consultation Gladman raised concerns with the duty to cooperate, the proposed housing requirement, and housing delivery within the Borough. Gladman does not think that the draft submission plan has addressed these concerns. Gladman discusses these topics within this consultation response below.
- 1.1.4 Gladman does not have any land interests in Reading Borough Council (RBC) itself, however Gladman have land interests on the edge of the authority boundary located within South Oxfordshire District Council (SODC). The sites on the Northeast of Reading, have the potential to deliver 1,200 homes, a mobility hub, a new school and community facilities.
- 1.1.5 Although the sites are located outside the district boundary, they could go towards helping to meet the needs of RBC, through the duty to cooperate with South Oxfordshire District Council. The site would deliver a number of benefits, including delivering a mobility hub which is a key objective of the Reading Transport Strategy

2040. The sites are available, suitable, and deliverable for housing as summarised in Section 6 of this representation and the appended Vision Documents. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

2 DUTY TO COOPERATE

- 2.1.1 The Duty to Cooperate was a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The Levelling Up and Regeneration Act 2023, rescinded the Duty to Cooperate as a legal test and it is now an alignment test through National Policy.
- 2.1.2 Paragraphs 24-27 of the NPPF set out the requirements for the Duty to Cooperate to ensure a positively prepared and justified strategy. The NPPF requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.3 The NPPF, 2024 sets out how local plan authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

¹ PPG Reference ID: 61-001-20180913

- 2.1.4 Reading sits in a strategic position between several larger administrative areas including Oxfordshire and West Berkshire along with smaller local authority areas such as Wokingham and beyond this to Bracknell Forest and Windsor and Maidenhead. Despite these administrative boundaries, there are many functional interrelationships and interdependencies between the various settlements in this area and it is important to seek the views of neighbours to fully understand the cross boundary strategic needs. RBC has published a Duty to Cooperate Statement, November 2024 which sets out the position on Duty to Cooperate.
- 2.1.5 RBC wrote to nine neighbouring Councils in August 2024 highlighting the potential for unmet need arising within RBC if the partial update were to be based on the standard method housing number. All but one of the nine authorities responded to say that they had no capacity to meet any of Reading's unmet needs.
- 2.1.6 RBC have historically looked within the West Berkshire HMA to meet their unmet housing needs however, going forward the West Berkshire HMA as a whole is likely to have an unmet need, and RBC will likely need to look to SODC, as well to Wokingham or West Berkshire. RBC have identified that there is a strong functional relationship with the southern area of SODC², with many of the towns and villages within the south of the District looking towards Reading for services and facilities.
- 2.1.7 Gladman do not believe that opportunities to resolve the strategic needs of neighbouring authorities have been fully met and whilst RBC has been more proactive in promoting co-operation and dialogue this has not been reciprocated and therefore its impact has been limited. Duty to Cooperate is not something that can be done retrospectively and so this is an important matter to address during the preparation of the plan.

² Local Plan Partial Update Pre-submission Draft (November 2024) – Paragraph 3.1.1

-
- 2.1.8 The approach taken to Duty to Cooperate is not sound given that RBC has not effectively engaged with neighbouring authorities, and vice versa, ahead of the regulation 19 consultation.

3 LEGAL COMPLIANCE

3.1 Sustainability Appraisal

- 3.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.1.2 Reading Borough Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative for the Reading Local Plan Partial Update is a crucial part of decision-making and scoring should be robust, justified and transparent.
- 3.1.3 The SA is flawed as it does not consider the potential for accommodating unmet housing need from nearby local authorities, in particular South Oxfordshire. The options considered in relation to housing provision are limited to:
- Option H1(i) Housing provision figure to be amended to reflect available capacity to 2041 (825 homes per year).
 - Option H1(ii) Retain existing approach, do not update the housing provision figures.
 - Option H1 (iv) Housing provision of 878 homes per year (need based on national standard methodology).
 - Option (v) Housing provision of 735 homes per year (based on latest locally based need figure).
- 3.1.4 RBC has limited its options assessment to meeting only its own needs. There has been no assessment of meeting the needs of adjoining authorities in the wider housing

market area. Whilst the chosen housing number of 825 is based on 'capacity' rather than the standard method figure, tested options have been limited.

- 3.1.5 As a general observation, we would also note that Options H1(i) and (iv) perform the same in the scoring matrix provided on page 75 of the Pre-Submission SA report, meaning that is unclear why the former has been chosen in preference to the latter in SA terms. Whilst the supporting commentary to the assessment reasons that H1(i) is the preferred choice, as this would be in line with the borough's capacity, avoids unnecessary over-development and provides housing for current and future generations, the results of the SA do not appear to support its selection in preference to all the stated alternatives.
- 3.1.6 Gladman consider that a much more thorough and broader assessment of need is required working closely with adjoining authorities. Indeed, it would be more appropriate to conduct a full plan review given the significant issues within the sub-regional housing market, the scale of need to be accommodated and the subsequent changes required to the current plan. This is further highlighted with the emergence of the stock-based method for calculating housing need within the revised NPPF (December, 2024).
- 3.1.7 In conclusion, the SA is flawed as it has not fully considered the options for the Local Plan Partial Update.

4 NATIONAL PLANNING GUIDANCE

4.1 National Planning Policy Framework

4.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

4.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

4.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

4.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Reading Local Plan Partial Update provides a

sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

- 4.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method in the national planning practice guidance.
- 4.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 68 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs.
- 4.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 26 of the NPPF 2024).
- 4.1.8 It is important to note that through the consultation period of the pre-submission draft plan the Government published the revised NPPF, 2024 on 12th December 2024. Transitional arrangements for Local Plans are set out in Annex 1, paragraph 234 states that the NPPF 2024 will apply from 12th March 2025, other than when a plan has reached Regulation 19 before the 12th March 2025 and meets at least 80% of the Local Housing Need.
- 4.1.9 Given that the plan meets 80.2% of the Local Housing Need the plan should be assessed on the NPPF 2023.

4.2 Written Ministerial Statements

- 4.2.1 The need to plan for the sufficient delivery of homes is affirmed in the Written Ministerial Statement (WMS) given by the Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government, Angela Rayner on 30 July 2024.
- 4.2.2 The WMS, July 2024 reaffirms that the country is in *"the most acute housing crisis in living memory"* and is clear in its conclusion that *"there is no time to waste. It is time to get on with building 1.5 million homes"*. These are now material considerations for plan making and decision making and clearly set the tone and direction of the newly elected Government.
- 4.2.3 A further WMS was published on 12th December 2024, alongside the publication of the new NPPF. The WMS highlights the reality of the housing crisis, with 160,000 children living in temporary accommodation, due to housing costs. The Government has an ambitious goal of delivering 1.5 million homes over the parliament, alongside infrastructure.
- 4.2.4 The Government highlights that the planning system will remain a 'plan-lead approach', however plans must meet the housing needs. Therefore, a mandatory housing targets, through the revised standard method which should be the basis of housing requirements within Local Plans.

5 PRE-SUBMISSION DRAFT

5.1 Background

- 5.1.1 RBC adopted the Reading Borough Local Plan in November 2019. A review of the policies of the adopted Plan was undertaken in March 2023, and it was considered that a Partial Update to the Local Plan would be required. Work started on the Partial Update in 2023 with the regulation 18 consultation taking place in January 2024.
- 5.1.2 As previously stated, the NPPF, 2024 has now been published. However, given that this plan has reached regulation 19 and meeting 80% of the Local Housing Need (based on RBC's own commissioned assessment), the transitional arrangements within Annex 1 state that the plan should be considered under the NPPF 2023.
- 5.1.3 The sections that follow below include specific comments from Gladman on the Council's preferred options covering a range of the topics and questions that have been posed.

5.2 Plan Period

- 5.2.1 RBC are proposing a plan period of 2023 to 2041. The NPPF suggests that strategic policies should look forward over 15 years from the date of adoption. The Council currently aim to adopt the plan in October 2025 this would allow for a 16 year plan period from the point of adoption. The timescales for adoption are currently optimistic, the Council should consider extending the plan period the timescale to allow for any delay within the adoption in the plan.
- 5.2.2 The HELAA, which assesses the housing capacity uses a base date of 1st April 2024, and at the land availability going forward. The Council should consider amending the plan period to reflect the base date of 2024.

5.3 Housing Needs

- 5.3.1 Gladman note that the Council considers there are exceptional circumstances in Reading which justify the use of a local assessment of housing need rather than applying the Standard Method. In particular, there are concerns regarding the level

of overall need with the 35% urban uplift applied (878 dwellings per annum). In order to calculate what the Council considers to be a more accurate reflection of local housing need, an assessment of jobs led growth has been carried out which has identified a figure of 735 dwellings per annum (dpa), or a total of 13,230 dwellings between 2023 and 2041.

- 5.3.2 Whilst it is then acknowledged that the number of homes which the updated plan provides for has been uplifted to 825 dpa to reflect capacity (see further analysis of this below), thereby indirectly dealing with some of the unmet need from surrounding authorities, it is considered that this figure is still too low, noting that it is derived from RBC's commissioned assessment of housing need. It will be necessary to test this figure through the Examination process, to ensure that it is appropriately evidenced, taking account of cross-boundary housing and other development needs.
- 5.3.3 This is particularly relevant in the context of the standard method representing the starting point in determining the local housing needs for an area and indeed the stock-based Standard Method which emerged with the Government's revised NPPF, December 2024. The stock-based Standard Method would see Reading's annual requirement increasing from 878 to 1,028 dwellings per annum.
- 5.3.4 The transitional arrangements set out in Annex 1 of the NPPF, 2024, state local plans should meet 80% of the Standard Method. Based on RBC's assessment, the proposed housing requirement results in meeting 80.2% of the Standard Method, this is only marginal with delivering 3 dwellings over the 80% target. Gladman consider that the housing requirement should be reconsidered in meeting the higher housing need.
- 5.3.5 In terms of need within the Borough, there has been a significant amount of high-density housing (particularly flats) in the urban area over recent years and the Council must now seek to address this imbalance and prioritise the delivery of much needed family homes. The Reading Housing Needs Assessment (July 2024) sets out the overall housing needs by property size³, the need for smaller units 1-2 bedroom is

³ Reading Housing Needs Assessment, July 2024 – Figure 6

5,125 units, where as the need for 3 bedroom properties makes up the majority of the housing need with a need of 5,944 units and an additional 2,026 units in need of 4 bedroom properties. The HELAA has assessed the available land within the borough and the types of dwellings coming forward, many of the sites are urban in nature and would deliver high density housing. Looking at the deliverable sites, with either previous allocations or planning applications pending or approved, it is clear, that there is an imbalance with the need for family houses, the majority of applications coming forward are for apartments, with a mix of 1, 2 and 3 bedrooms. However, there is a high number of 1 and 2 bedroom apartments within that mix. The HELAA does not give enough evidence to provide the assurance that the capacity within the Borough would deliver the types of homes actually needed within the Borough.

5.3.6 Gladman have undertaken a Future Housing Needs Assessment of the West Berkshire Housing Market Area (HMA), this report can be found in Appendix 1. This looks at the housing needs of the HMA up until 2050, and the potential capacity within the HMA. The report highlights that the ability to meet the long-term housing needs within the HMA are limited, the HMA will need to other areas to help meet this need

5.3.7 In order to properly assess the needs of the Borough, a partial review of the plan is insufficient and Gladman consider that a full plan review which fully considers all options for growth in the context of the sub-regional housing market should be conducted as a matter of urgency.

5.4 Housing Capacity

5.4.1 As identified above RBC have uplifted their local housing need identified within the Reading Housing Needs Assessment, July 2024, to reflect the capacity within the Borough. RBC have undertaken a capacity review within the HELAA published in November 2024. The HELAA concludes that there is a potential capacity to 14,849 dwellings from 2023 to 2041 within Reading Borough.

5.4.2 Following identifying the total capacity within Borough, the assessment considers the deliverability of the sites. The sites have been split into deliverable, developable and

potentially developable. Deliverable sites have been identified as deliverable now, developable sites have been identified to have a potential to be deliverable in 6-10 and 11-15 years, potential developable sites have been deemed likely of delivery however with a diminishing likelihood.

5.4.3 The capacity figure also includes the completions for the year 2023-2024, windfalls and additional allowance for suburban regeneration areas. The sites are spilt up as follows:

Type of development	Completions (2023-2024)	HELAA sites – deliverable	HELAA sites – Developable	HELAA sites – potentially developable	HELAA sites – total	Windfalls	Additional Allowances	Total Supply
Residential	1,028	4,019	6995	874	11,887	1,534	400	14,849

5.4.4 Gladman have concerns regarding the deliverability of the claimed capacity. Gladman have undertaken a capacity review to gain an understanding of the capacity, its deliverability and the type of dwellings that are potentially being delivered. The capacity review has looked at the 'deliverable', 'developable' and the 'potentially developable' sites.

5.4.5 Gladman have concerns with including the 'potentially developable' sites which have very little evidence as to whether they would be deliverable over the plan period, furthermore a number of the 'developable sites' need further evidence as to their deliverability. The main concerns have been raised through the review are where sites currently have functioning businesses on with no evidence of moving the business. Gladman's assessment reduced the capacity by 2,005 units. This would reduce the total supply to 12,844. This supply would reduce the capacity to below the identified need of 13,230 and result in a delivery of 713 dpa.

5.4.6 Gladman's capacity assessment has been based on board assumptions, with limited access to all the evidence base, however the Council need to ensure there is a robust evidence base behind the deliverability of all the sites. At the very least the 'potentially developable' sites should not be included within the capacity. Gladman

do not believe there is adequate capacity within the borough to meet the identified need, and therefore the Council do need to be engaging with surrounding Local Authorities to help deliver the identified need.

5.5 Housing Delivery

5.5.1 Gladman consider it important to consider the historic delivery of the Borough when considering the evidence base on the housing capacity and likelihood of delivery of the sites. Gladman consider the capacity review to be overly optimistic.

5.5.2 Over the previous 13 years a total of 5680 dwellings have been delivered within RBC, with an average of 406 units. RBC have not once over the past 13 years delivered in the region of the claimed housing need of 735dpa let alone the capacity of 825dpa. Gladman consider that these historic trends should be taken into account within the capacity review, as it seems unlikely that RBC will be able to achieve the proposed housing requirement. RBC should be engaging within neighbouring Local Authorities to help meet the needs identified.

Year	Completions
2010/11	360
2011/12	320
2013/14	400
2014/15	80
2015/16	450
2016/17	360
2017/18	670
2018/19	590
2019/20	100
2020/21	430
2021/22	570
2022/23	370
2023/24	610
Total	5680
Average	406

5.6 Transport Strategy

- 5.6.1 Policy TR1 sets out the policy to achieve the Reading Transport Strategy 2040. The most recent Reading Transport Strategy was adopted by the Council on 15th October 2024. The Transport Strategy sets out aspirations of the Council to promote sustainable transport modes and potential projects to help meet the aims of the strategy.
- 5.6.2 The Council acknowledges⁴ that new development will play a vital role in helping achieve the objectives of the transport strategy through providing appropriate contributions.
- 5.6.3 Policy TR2: Major Transport Policies, identifies the projects that are identified within the Reading Transport Strategy. It is important to note that many of these projects are aspirational and do not yet have funding streams. This includes a potential Thames Crossing. This crossing point does not have the buy in from all required stakeholders including neighbouring local authorities.
- 5.6.4 The provision of mobility hubs has been identified as a key strategy and project for the Borough. A number of these mobility hubs would need to be located on the edge or outside of the borough boundary. The Council have identified⁵ that they are working with neighbouring local authorities to help deliver the mobility hubs.
- 5.6.5 One of the locations for a mobility hub is located on the A4155, Henley Road. Given the constraints of the borough the only location for this would be within South Oxfordshire. Reading should be discussing the site North of Henley Road with South Oxfordshire as a location to deliver the mobility hub, alongside delivering much needed housing. The provision of mobility hubs will unlikely come forward without the development alongside them.

⁴ Paragraph 4.5.2 of the pre-submission draft plan

⁵ Paragraph 4.5.8 pre submission Draft Plan

5.7 Local Plan Review

- 5.7.1 Gladman do not consider that the plan in its current form is sound, however should the plan be found sound, an immediate review should take place. This policy should set out a clear timescale for the start of the review, with deadlines for consultations and adoption.
- 5.7.2 The NPPF 2024 within the transitional arrangement regarding local plan, sets out that where Local Plans that have been submitted for examination prior to 12th March 2025, with less than 80% of the standard method, local planning authorities should start work on a new local plan to address the shortfall. Given that the proposed housing requirement within the Reading Partial update is only 3 homes over the 80% an immediate review should take place to address the shortfall.
- 5.7.3 Gladman recommends the following policy wording based upon the Bedford Local Plan review policy is inserted into the plan to ensure that the plan remains up to date and in line with national policy.

Policy XX: Reviewing the Local Plan Update

The Council will undertake an immediate review of the Local Plan Update. An updated plan will be submitted for examination no later than 30 months after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies relating to the supply of land will be deemed out of date in accordance with paragraph 11d) of the National Planning Policy Framework. The reviewed plan will secure levels of growth that accord with the Standard Method and any growth deals that have been agreed.

6 SITE SUBMISSION PROFILES

6.1 North-East Reading

- 6.1.1 Gladman submit that the Reading Local Plan Partial Update should be considering directing housing outside of the district as housing needs are not currently being met within the Borough boundaries. Directing housing to the northeast of Reading within South Oxfordshire would allow for housing needs, while delivering mobility hubs as set out within the transport strategy. The delivery of housing in this location would recognise the key functional relationship between this key sub-regional centre and the southern area of South Oxfordshire.
- 6.1.2 It is noted that the Reading Local Plan Partial update would not be able to allocate the land, given it is located outside the local plan boundary. However, consideration should be given to the location, and discussions with South Oxfordshire should be had to secure the delivery of the land.
- 6.1.3 Land North-East of Reading is situated immediately adjacent to the urban area of Reading, providing a unique opportunity to create an inherently sustainable and high-quality development. The site has the ability to accommodate beautiful, well-designed homes alongside significant areas of greenspace and community infrastructure, in a highly sustainable and accessible location for further development.
- 6.1.4 Land North-East of Reading is not affected by some of the environmental and policy designations that affect other parts of the South Oxfordshire area. The site lies outside of Chilterns Area of Outstanding Natural Beauty and Green Belt and could be developed without giving rise to any unacceptable impacts on the natural or built environments or in landscape and visual terms.
- 6.1.5 The site benefits from access to a wide range of services and facilities by sustainable modes of transport, including amenities within the immediate locality, but also facilities in the neighbouring suburbs of Emmer Green and Caversham, and the wider Reading urban area. The site's development also has the potential to provide new infrastructure to serve both new residents and the wider area, including the provision

of a new Park and Ride/mobility hub facility on the northern approach to Reading, which is an aspiration of the emerging Reading Local Transport Plan 2040.

- 6.1.6 Gladman would welcome the opportunity to discuss its proposals for Land North-East of Reading with the Council, to understand how our proposals could be optimised to meet local growth and development aspirations. A separate Vision Document is provided at Appendix 2 to these submissions setting out further background to this site and its development potential.

7 CONCLUSIONS

7.1 Summary

- 7.1.1 Gladman welcomes the opportunity to comment on the Pre-submission Draft of the Reading Local Plan Partial Update. These representations have been drafted with reference to the National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 7.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 7.1.3 The Council needs to further engage with neighbouring Local Authorities to ensure that the housing needs of the Borough can be met. The identified capacity within Reading to deliver housing is optimistic. A further review of capacity is required ensuring a robust evidence base. Furthermore, additional aspirations of the Council such as the Transport Strategy require engagement with neighbouring Authorities. These conversations should be had, and sites identified prior to the adoption of the plan.
- 7.1.4 We hope you have found these representations informative and useful towards the preparation of the Reading Local Plan Partial Update.
- 7.1.5 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

APPENDICES

Appendix 1: West Berkshire Future Housing Needs Assessment

Future Housing Needs Assessment

Western Berkshire Housing Market Area An assessment of housing delivery, future needs and supply across the Housing Market Area up to 2050.



Contents

Executive Summary.....	3
Introduction	4
Housing in High Demand	7
Housing Need and Delivery	10
Housing Supply	14
Future Housing Supply.....	21
Opportunities for New Development	23
Conclusions	28



Executive Summary

A theoretical housing supply up to 2041 has been derived for each authority area, through analysis of local plan documents, SHLAAs, HELAAs and housing land supply statements. Across the HMA there is projected to be a potential supply of between 45,994 and 56,214 homes over the period 2023-2041, with a further 61,171 homes to be identified between 2041-2050.

Given historic annual delivery figures the above are considered to be optimistic, particularly given the context of the significant constraints affecting the HMA, including , flooding, nuclear installation consultation zones, tight urban boundaries, AONB and Green belt. The ability of Western Berkshire HMA to address the identified housing needs to 2050 is likely to be problematic. The authorities comprising the HMA must look to address the arising issues now to ensure future housing delivery meets needs through taking the opportunity to look beyond their administrative boundaries and engaging with neighbouring areas.

Introduction



Introduction

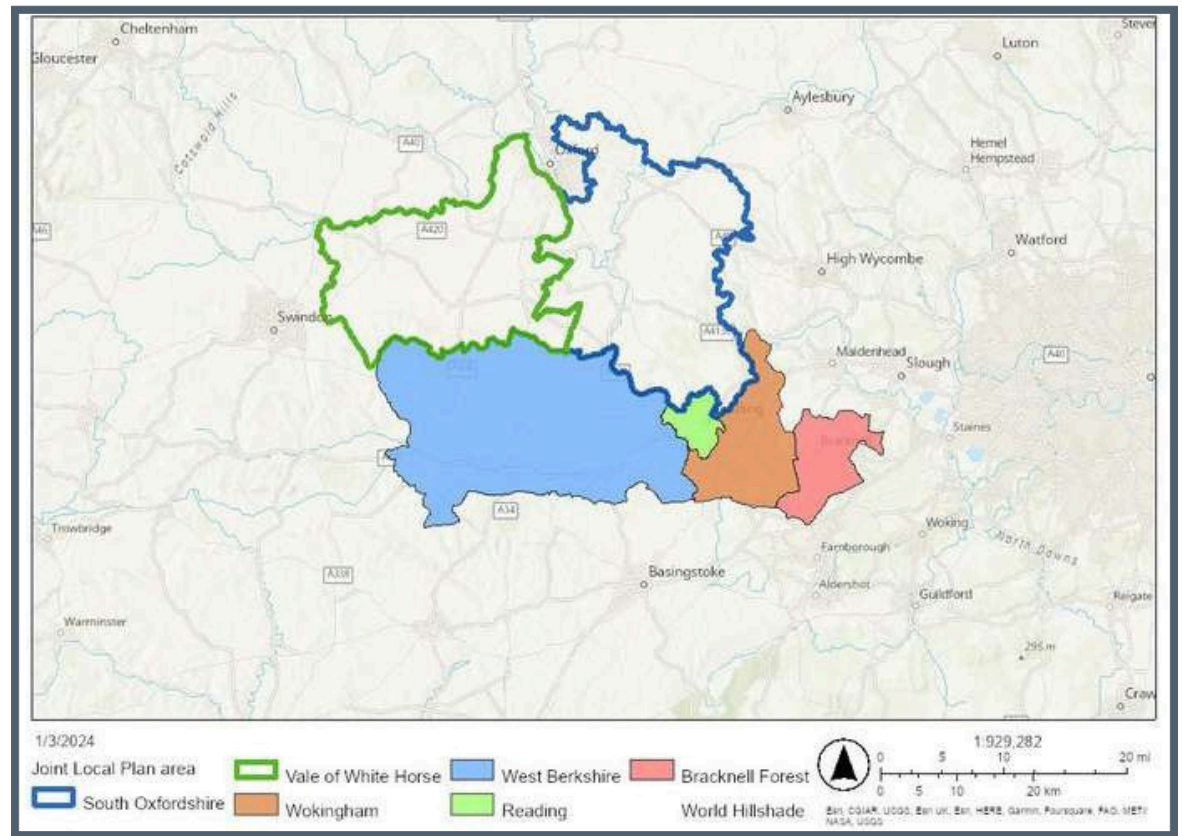
Context

This report provides an objective assessment by Gladman on the housing needs across the Western Berkshire Housing Market Area (HMA) by understanding historic housing delivery before analysing the indicative housing need and supply figures for the period up to 2050. It is acknowledged that Reading Borough Council are currently preparing a Local Plan Partial Update and are seeking to extend the plan period up to 2041. Therefore, this report looks at the most up-to-date publicly available information and also seeks to understand future housing needs that must be considered as part of a full review. Finally, the report outlines opportunities which the region could promote to aid housing delivery and affordability across the HMA to meet future housing needs.

Introduction

Context

Western Berkshire Housing Market Area (HMA) comprises of Reading Borough Council; Bracknell Forest Council; West Berkshire Council; and Wokingham Borough Council. The four authorities have agreed to work collaboratively to consider how to meet the identified Objectively Assessed Housing Need for the market area. The councils will also be working collaboratively to identify how to meet future economic development needs in the area with consideration of how need should be accommodated across the HMA, particularly where these needs cannot be met within authority boundaries, notably in Reading.



Housing in High Demand



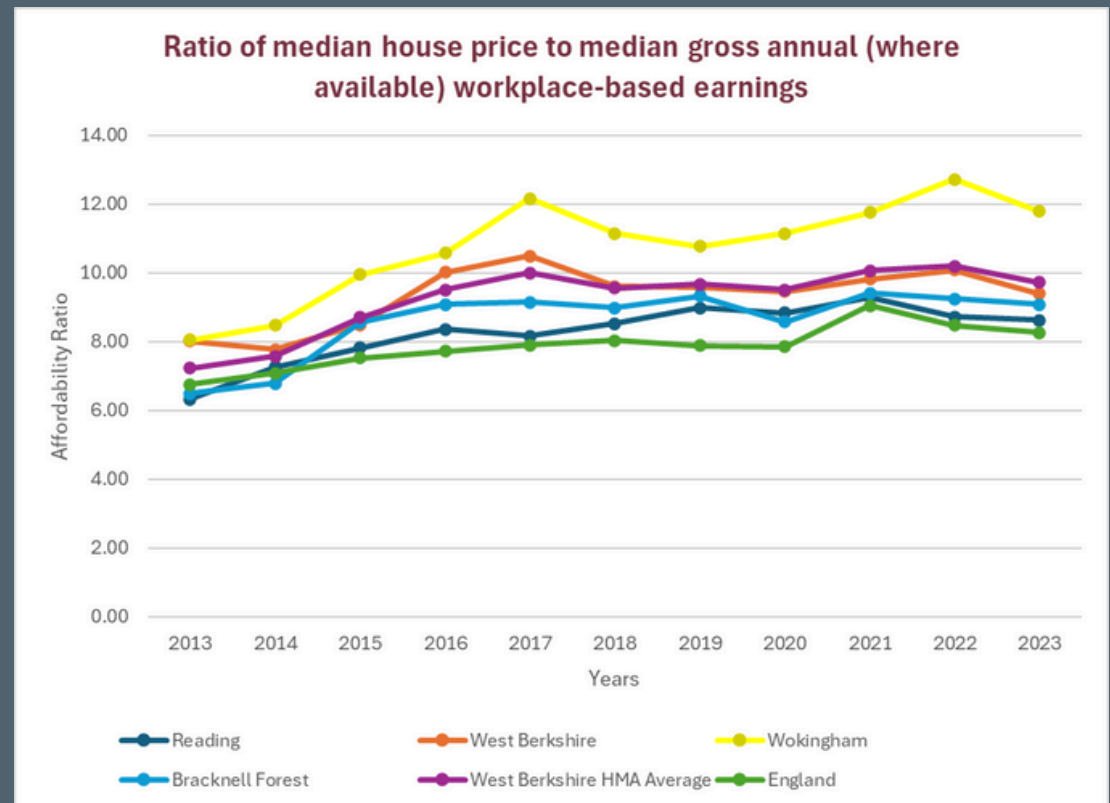
Housing in High Demand

Housing Cost and Affordability

The current housing crisis is defined by the unaffordability with first time buyers locked out of home ownership, an issue which was only exacerbated during the COVID-19 pandemic. The following information provides a stark overview of the affordability issues and housing costs facing the Western Berkshire HMA.

Affordability ratios, calculated by dividing median housing prices by median gross annual workplace-based earnings, provide one indicator of the affordability issues within the HMA. Mortgage lenders typically offer loan to income ratios up to a cap at around 4.5 times annual salary.

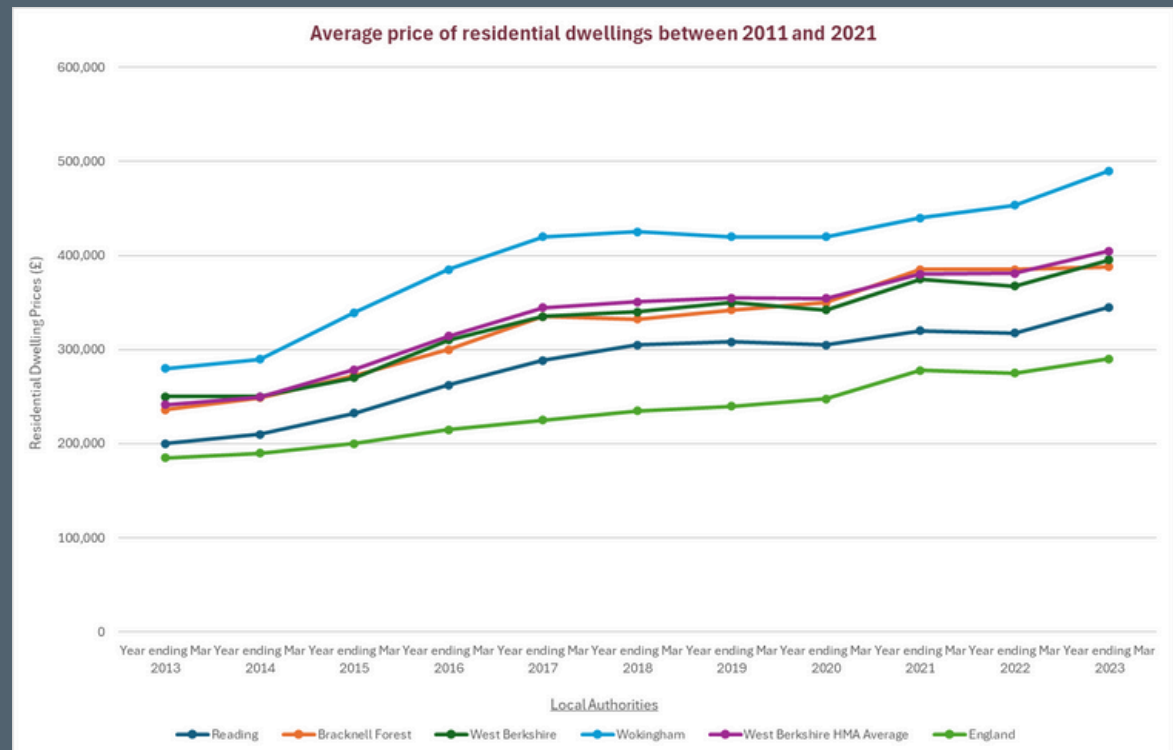
The local authorities within the HMA have experienced a significant increase in affordability issues since 2013 with the average ratio now lying above that of the national figure. The average ratio across the HMA stands at 9.73



Housing in High Demand

Housing Cost and Affordability

The affordability issues within the HMA are further underlined when analysing the average price of residential dwellings over a ten-year period between 2013 and 2023. The average house price has increased significantly in all the Western Berkshire HMA local authorities since 2013. Indeed, the average house price in Wokingham now stands at £490,000, with the average house price across the whole HMA standing at £404,563. Both figures are significantly higher than the national average house price of £290,000. In terms of the private rental market, the mean monthly rental costs across all residential property types in Western Berkshire HMA in at £1,193, 41.18% higher than the mean monthly residential costs across England of £845.



Housing Need and Delivery



Housing Need and Delivery

Local Housing Need Figures

The NPPF 2023 states that, the standard method for calculating Local Housing Need is the starting point for determining the number of homes needed within strategic planning policies, unless there are exceptional circumstances to justify an alternative approach. The NPPF 2024 revises the standard method, and paragraph 62 of the framework states that strategic policies should be informed by the standard method and any unmet need from neighbouring authorities should be taken into account. This assessment has employed the local housing need figures below as the basis for the housing need across the HMA up to 2050. This does not account for any uplift to deliver economic growth or potential changes in the local housing need figure following updated evidence such as affordability ratios or population changes.

The new Standard Method figure was published on 12th December 2024, this highlights a significant increase in housing required across the West Berkshire HMA in comparison to the number in the respective adopted local plans.

Authority	Adopted Local Plan Requirement (per annum)	Stock Based Standard Method (2024) (per annum)	Indicative Housing Need based on Stock Based Standard Method (2023 – 2050)
Reading	689	1,028	27,756
Bracknell Forest	712	766	20,682
West Berkshire	525	1,070	28,890
Wokingham	662	1,336	36,072

Housing Need and Delivery

Historic Delivery

The following table sets out the housing delivery figures for the Western Berkshire HMA authorities since the 2010/11 monitoring year, as published in the live tables on housing supply . Over this 14-year period 26,780 new homes were delivered in the HMA, with peak delivery occurring in 2018/19 where 3,000 new dwellings were completed.

	Reading	Bracknell Forest	West Berkshire	Wokingham	HMA Total
2010/11	360	440	110	170	720
2011/12	320	250	130	180	880
2012/13	400	470	200	290	1360
2013/14	370	360	410	420	1560
2014/15	80	320	320	510	1230
2015/16	450	180	460	440	1530
2016/17	360	370	340	790	1860
2017/18	670	260	450	1250	2630
2018/19	590	520	400	1490	3000
2019/20	100	960	250	1590	2900
2020/21	430	510	180	1020	2140
2021/22	570	480	510	960	2520
2022/23	370	400	520	830	2120
2023/24	610	720	260	740	2330
Total	5680	6240	4540	10680	26780
Average	406	446	324	763	1913

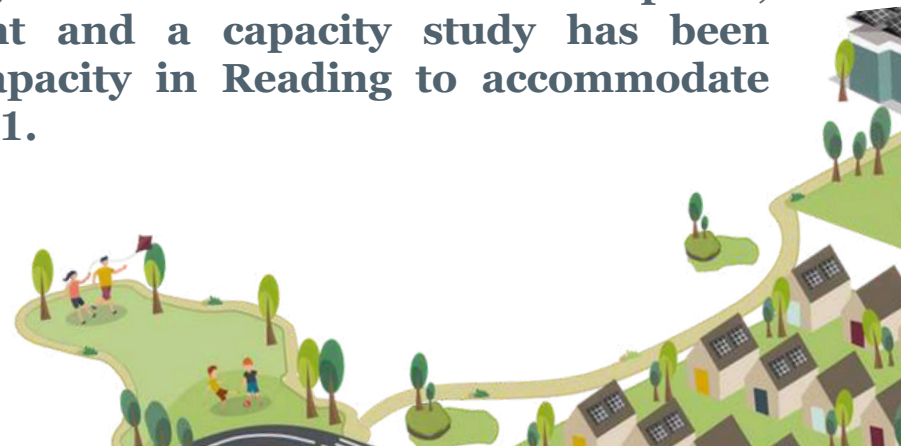
Housing Need and Delivery

Historic Delivery

Reading and West Berkshire have never achieved their respective adopted Local Plan annual housing requirements of 689 and 525 dwellings, while Bracknell Forest has delivered 712 dwellings or more in only two of the past 13 years. Only Wokingham has consistently delivered their Local Plan annual housing requirement since 2016/17. **Across the HMA the combined local plan requirements have only been achieved in 3 out of the 13 monitoring years.** While the combined HMA standard method figure has only been achieved in 2 out of the 13 years.

Against the combined adopted local plan housing requirement, there has been an **under delivery of 6,864 dwellings** during the period from 2010/11 in the HMA. This increases to an **under delivery of 9,022 dwellings** when assessed against the latest Local Housing Need figures. The HMA has been unable to deliver the identified Local Plan housing need figures, nor the standard method figures since 2010/11 and this is unlikely to improve over future monitoring periods.

Reading are currently at regulation 19 stage of their Local Plan Partial update, where a Local housing needs assessment and a capacity study has been undertaken, the Council claim there is capacity in Reading to accommodate approximately 825 homes per year up to 2041.



Housing Supply



Housing Supply

Housing Supply Capacity up to 2041

The following section sets out the potential housing supply capacity of each HMA authority to 2041, utilising a range of sources such as, emerging Local Plans and their evidence bases, housing land supply statements and Annual Monitoring Report (AMR).

It is important to highlight that the following assessments only provide a high-level supply capacity, with specific site circumstances, constraints and deliverability not analysed. Potential additional housing land included with including Strategic Housing Land Availability Assessments (SHLAAs) or similar is not included within the assessment as the Councils have not considered these sites deliverable with the period, however they may be able to contribute to the housing supply post 2041.

To provide flexibility and to account for additional speculative applications coming forward or delivery issues the following assessments sets out the Council's identified figure alongside a 10% buffer and discount. For those authorities where the latest evidence does not cover the period up to 2041, the average annual supply figures are utilised to project forward, this is set out for Bracknell Forest and Wokingham.

Housing Supply

Reading Borough Council

The Reading Local Plan was adopted in November 2019 and guides development between 2013 and 2036. The most recent Housing Provisions Background Paper, published as part of their Regulation 19 consultation within the HELAA of Section 5 outlines a housing capacity for 14,849 homes from 2023 to 2041, an annual supply of 825 dwellings per annum. This is considered to be highly optimistic considering historic housing delivery figures in the borough.

10% Discount	Total Projected Delivery to 2041	10% Buffer
13,364	<u>14,849</u>	16,334

Housing Supply

Bracknell Forest Council

The Bracknell Forest Local Plan was recently adopted in March 2024. This document seek to guide development in the district between 2020 and 2037. This information sets out an anticipated housing supply capacity of 11,190 homes up to 2037, this equates to an average annual supply of 699 homes. Therefore the projected housing supply figure between the period 2023 - 2041 equates to a housing supply capacity of 11,889.

10% Discount	Total Projected Delivery to 2041	10% Buffer
10,700	<u>11,889</u>	13,078

Housing Supply

West Berkshire Council

The West Berkshire Development Plan consists of the Core Strategy, adopted in July 2012, and the Housing Site Allocations Document, adopted in May 2017. The Council are currently preparing a Local Plan Review to cover the period up to 2039, this was submitted for Examination in Public in March 2023.

This examination library and evidence base for the Local Plan Review outline the latest information on housing delivery and supply between 2023 and 2039, therefore it is appropriate to utilise this to outline the capacity of housing in the district over this period.

The Housing Background Paper (January 2023) trajectory identifies that a total of 8,524 dwellings are projected to be constructed between 2023 and 2039 inclusive of adopted and emerging allocations, committed developments sites on unallocated sites and a small site windfall allowance. Accounting for an additional two monitoring years equates to a housing supply capacity of 9,590 up to 2041.

10% Discount	Total Projected Delivery to 2041	10% Buffer
8,631	<u>9,590</u>	10,549

Housing Supply

Wokingham Borough Council

The Wokingham Borough Council Local Plan consists of the Core Strategy document which sets out key elements of the vision for development in the borough between 2006 and 2026. The Council have recently released the Proposed Submission Plan (Regulation 19). This sets out the planning policies proposed to manage development across the borough to 2040

This document outlines in order to meet the housing need across the borough, a requirement of 12,763 is required across the plan period. Table 6 provides a summary of the housing land supply from 1st April 2023 to 31st March 2039, totalling 13,134 dwellings. Accounting for an additional two monitoring years equates to a housing supply capacity of 14,776 up to 2041.

10% Discount	Total Projected Delivery to 2041	10% Buffer
13,298	<u>14,776</u>	16,254

Housing Supply

Western Berkshire HMA Summary

The following table sets out the total theoretical supply across the HMA up to 2041. The table summarises the potential housing land supply between 2023-2041 using the latest available evidence. For those authorities where the latest evidence does not cover the period up to 2041, the average annual supply figures are utilised to project forward, this is set out for Bracknell Forest, West Berkshire & Wokingham

It is projected that up to 2041, 51,104 dwellings are anticipated to be delivered requiring an annual delivery rate of 2,839 homes. This delivery figure has been achieved just twice across the HMA since 2010, therefore the achievability of this figure must be considered against historic delivery and the wider planning context of the authorities.

Even when a 10% discount to the housing supply is applied, it results in an annual delivery figure of 2,555 homes, which has only been achieved in three monitoring years since 2010.

10% Discount	Total Projected Delivery to 2041	10% Buffer
45,994	<u>51,104</u>	56,214

Future Housing Need



Future Housing Need

HMA Housing Need 2041 - 2050

This section seeks to identify the level of housing supply which needs to be identified to ensure needs are met up to 2050. The standard method for calculating local housing needs for the period 2023-2050 is a useful tool to understand the potential housing requirement over this period. However, it only accounts for the affordability climate in 2024 and does not provide any additional growth related to population changes or economic growth aspirations. Therefore, the figure represents a ‘starting point’ with the ‘end point’ yet to be assessed.

Authority	Standard Method 2024 (2023 – 2050)	Total Projected Delivery 2023 - 2041	Housing Required between 2041 - 2050
Total	112,185	51,014	61,171
Annual	4,155	2,839	6,796

Against the total projected delivery figure (no buffer or discount), and taking into account the Standard Method Requirement, there is a need to identify an additional 61,171 homes to meet the local housing need figure between 2041-2050. This equates to a delivery rate of 6,796 homes per year which has never been achieved since 2010. In conclusion, this represents an optimistic delivery scenario.

Opportunities for New Development



Opportunities for New Development

Physical and Policy Constraints

The Western Berkshire authorities are set within a context of significant landscape character, ecological and policy designations which ultimately restricts the amount of land available for new development.

The total area of the HMA equates to approximately 103,240 hectares (ha) and 'Protected Areas' including Green Belt, AONB, National Parks, Sites of Special Scientific Interest (SSSI), Nature Reserves and other conservation sites account for nearly 60% of the total HMA area. While nearly 18% of the overall district is defined as 'built up areas' limiting the opportunity for further development growth.

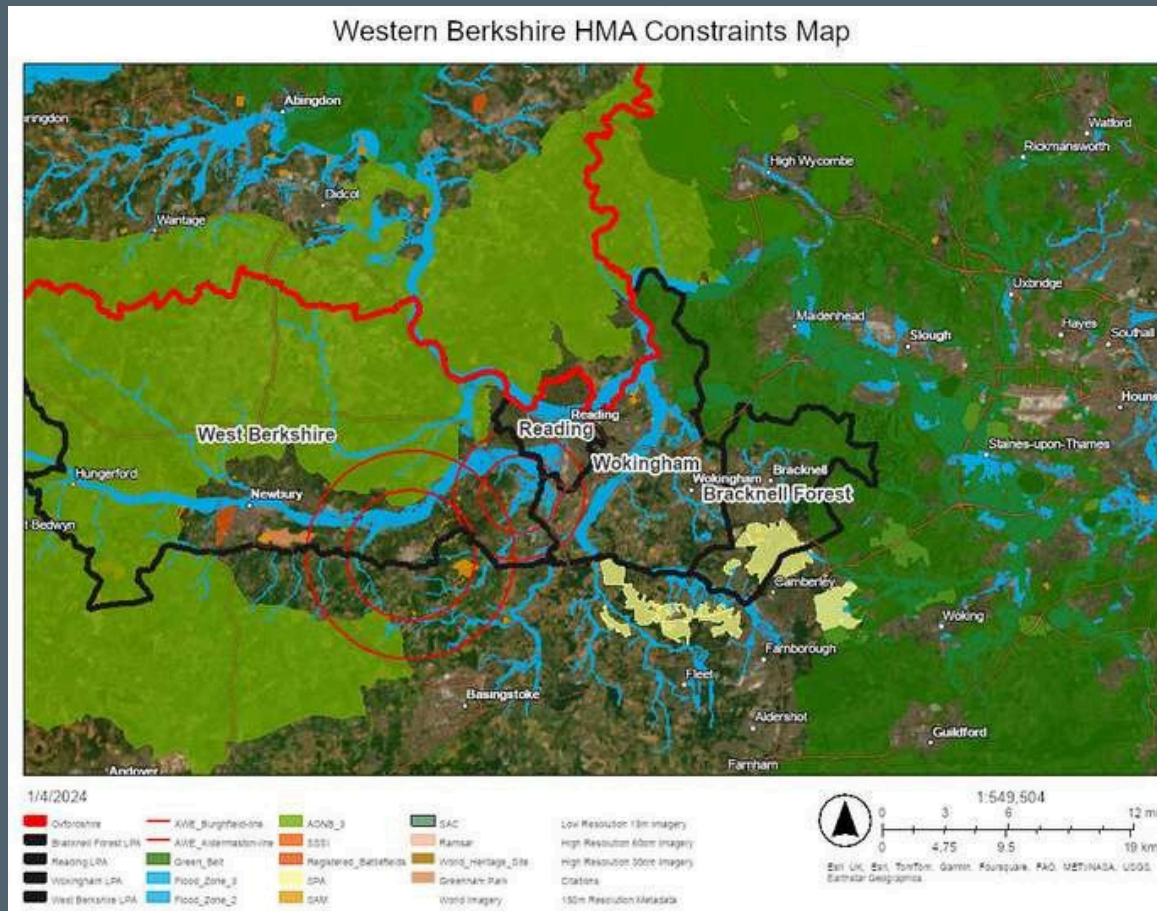
	Total Area (ha)	Protected areas (inc Green Belt) (ha)	Protected areas (inc Green Belt) (%)	Built Up Area (ha)	Built Up Area (%)
Reading	4,040	0	0	3,376	83.6
Bracknell Forest	10,900	3,839	35.1	3,611	33
West Berkshire	70,400	52,600	74.7	5,817	8.3
Wokingham	17,900	2,930	16.4	5,564	31.1
HMA	103240	59369	57.5%	18368	17.8%

In addition, to the above figures there are further constraints to development such as areas at risk of flooding and significant proportion of West Berkshire, Reading and Wokingham authority areas are subject to planning restrictions due to the nuclear installations at AWE Aldermaston and Burghfield. The Office for Nuclear Regulation has indicated that it would advise against all new residential development within the inner land use planning zones.

Opportunities for New Development

Physical and Policy Constraints

The map adjacent depicts a high-level framework of potential technical and policy constraints including heritage assets, ecological designations, flood risk, Green Belt, Area of Outstanding Natural Beauty, and the Nuclear consultation zone which are likely to impact the HMAs ability to deliver housing.



Opportunities for New Development

Land to the north of Reading

With limited growth opportunities remaining across the HMA, it will be necessary for the local authorities of the West Berkshire HMA to consider development opportunities on a cross-boundary basis. Land to the north of Reading, which falls within the jurisdiction of South Oxfordshire District Council, is one area which is not affected by any formal designation and lies outside of the Green Belt and Area of Outstanding Natural Beauty. Reading is an inherently sustainable and suitable location to accommodate future growth and given its functional economic and social links with South Oxfordshire, land to the north of Reading warrants detailed consideration in the determination of future growth opportunities to deliver the housing need of the West Berkshire HMA.

Given the detailed constraints explored above Gladman contend that an element of development adjacent to the urban area to the North of Reading will be a crucially important aspect of an appropriate spatial strategy for the West Berkshire HMA looking forward. The functional relationship between the two areas, the opportunities to access employment opportunities, the accessibility of sustainable transport modes as well as accessibility to readily available infrastructure, services and facilities all combine to form a compelling reason for directing an element of future growth adjacent to the urban area of Reading.

Opportunities for New Development

Land to the north of Reading

Land north to the north of Reading Opportunity Area



1/15/2024

- Potential Park & Ride Scheme
- Potential Growth Area
- Arable Woodland
- Registered Park and Garden
- Local Plan Policies EN7 LOCAL GREEN SPACE AND PUBLIC OPEN SPACE
- Reading

- National Constraints - Flood Zone 2
- National Constraints - Flood Zone 3
- National Constraints - GMR
- National Constraints - AGN
- Water Imagery
- Low Resolution 10m Imagery

- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Ordnance
- 10m Resolution Datasets



1:58,080
0 0.3 0.6 1.2 mi
0 0.5 1 2 km
Bathurst Geographics, Esri UK, Esri, TomTom, Garmin, Pousquare,
GeoTechnologies, Inc. METANASA, UGG

Conclusions



Conclusions

Summary

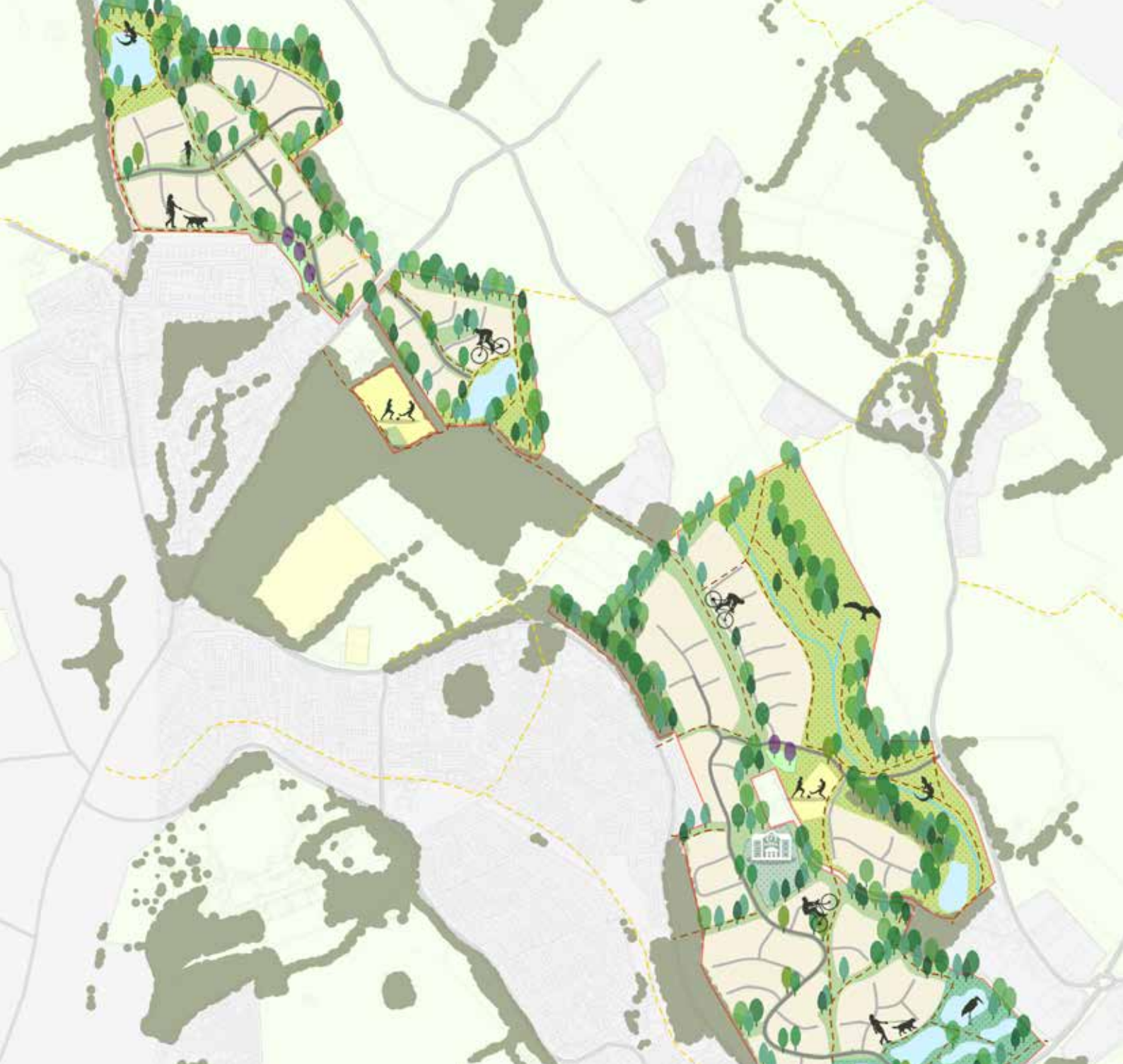
This document has set out to highlight the increasing housing delivery pressures facing the Western Berkshire HMA and notably in the Reading Borough between 2023 and 2050.

Analysis of local plan documents, SHLAAs, HELAAs and housing land supply statements a theoretical housing supply up to 2041 has been derived for each authority area, before a total figure calculated across the HMA.

Across the HMA, based upon the Council's figures there is a potential projected supply of between 45,995 and 56,214 homes over the period 2023-2041, with a further 61,171 homes to be identified between 2041-2050. Given historic annual delivery figures the above are considered to be optimistic, particularly given the context of the significant constraints affecting the HMA, including but not limited to, flooding, nuclear installation consultation zones and a tight urban boundary mean that it is unlikely that Reading will be able to deliver their own full housing needs up to 2050.

Therefore, and in conclusion, the ability of Western Berkshire HMA to address the identified housing needs to 2050 is likely to be problematic. The authorities comprising the HMA must look to address the arising issues now to ensure future housing delivery meets needs through taking the opportunity to look beyond their administrative boundaries and engaging with neighbouring areas. Indeed, the emerging South Oxfordshire and Vale of White Horse Joint Local Plan presents a deliverable and suitable opportunity to ensure strategic needs are met in functional locations and outside of significant constraints.

Appendix 2 - Land North East of Reading Vision Document



Play Hatch & Emmer Green

Creating sustainable communities

A VISION FOR LAND NORTH OF READING



February 2024

V4



Delivering the housing need
Meeting the environmental challenge

Contents

1.0 INTRODUCTION

2.0 THE HOUSING CHALLENGE

The problem

The solution

3.0 VISION

The vision

The benefits

4.0 SITE CONTEXT

A sustainable location

Avoiding sensitive landscape and heritage assets

Minimising flood risk

Responding to opportunities

5.0 PLANNING CONTEXT

Local policy

Eye and Dunsden Neighbourhood Plan

6.0 DELIVERING AFFORDABLE HOUSING

7.0 BUILDING BEAUTIFUL

8.0 MOVING FORWARD



Adding value and
unlocking opportunities

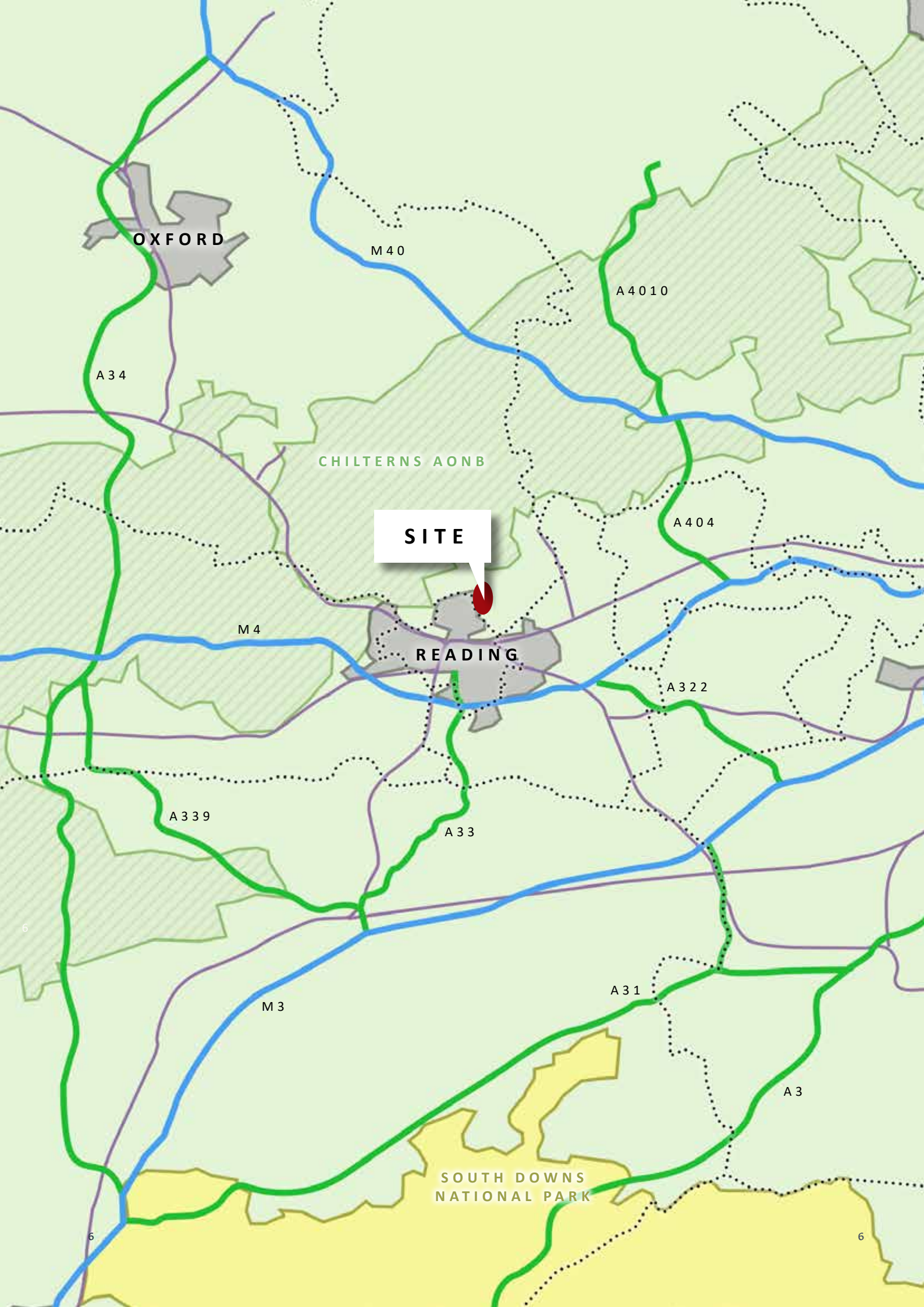
1.0 Introduction

South Oxfordshire and Vale of White Horse District Councils, together with Reading Borough must identify a sufficient supply of sites to meet their housing needs. Both authorities face significant challenges, as environmental and policy constraints, such as the Chilterns AONB, create limited growth opportunities.

Growth to the north of Reading, south of the AONB, has the potential to play a key role in meeting any unmet housing needs from the Town, as well as accommodating future housing needs of South Oxfordshire and the wider Western Berkshire housing market area.

An area of land over 100 ha between the settlements of Play Hatch and Emmer Green, is available, accessible and deliverable. It has the potential to provide up to 1,200 new homes, a new Park and Ride facility to serve Reading, other local transport initiatives, a new school and community facilities, new and improved sports facilities, and significant areas of new woodland and habitat to enable the development to sit comfortably within the landscape and respond to the climate and biodiversity emergencies.

Gladman are keen to engage with representatives of South Oxfordshire District and Reading Borough Councils, alongside other local stakeholders, to understand how the emerging proposals for North Reading could be optimised to meet local aspirations for growth and development.



OXFORD

M40

A4010

A34

CHILTERNS AONB

SITE

A404

M4

READING

A322

A339

A33

M3

A31

A3

SOUTH DOWNS
NATIONAL PARK

2.0 The housing challenge

The problem

South Oxfordshire, in collaboration with Vale of White Horse, are preparing a new Joint Local Plan and must identify a sufficient supply of sustainable, deliverable and suitable sites to meet their housing needs accommodated within a sustainable development strategy accounting for environmental and landscape constraints such as the Chilterns AONB and opportunities at major urban centres and employment hubs.

In this regard, the north eastern edge of Reading and the services and facilities that this key sub-regional hub provides, lies directly adjacent to South Oxfordshire's administrative area, and represents a suitable and sustainable location in which to deliver further growth.

Alongside the preparation of the new Joint Local Plan, the Reading Local Plan was adopted in November 2019 and guides development between 2013 and 2036. The Local Plan plans for an average of 689 homes per annum, **leaving a shortfall of 230 dwellings up to 2036.**

The Council have also commenced work on their Local Plan Partial Update which will extend the plan period up to 2041. The standard method for calculating local housing need represents the starting point for identifying local plan housing requirements and the figure for Reading Borough currently stands at 877 dwellings per annum, significantly higher than in the current Local Plan which already identified unmet housing needs.

There are limited growth opportunities within Reading Borough to meet current and future growth needs primarily due Reading's administrative boundary sitting close to the urban edge of the Town and significant environmental and policy constraints. This means that there are likely to be significant challenges meeting Reading's growth needs up to 2041 and beyond.

The solution

Growth to the north of Reading, south of the AONB, has the potential to play a key role in meeting housing needs within South Oxfordshire, as well as accommodating future housing needs arising from Reading and the wider Western Berkshire housing market area.

The area between the settlements of Play Hatch and Emmer Green, represent a sustainable, logical location in very close proximity to Reading and key transport networks alongside offering the ability to enhance the sustainability and connectivity of the area. In addition, the sites are unconstrained by environmental and policy designations in comparison to the wider region.

An area of land over 100 ha is available, accessible and deliverable with the potential to provide up to 1,200 new homes, a new Park and Ride facility to serve Reading, other local transport initiatives, a new school and community facilities, new and improved sports facilities, and significant areas of new woodland and habitat to enable the development to sit comfortably within the landscape and respond to the climate and biodiversity emergencies.



EMMER
GREEN

CAVERSHAM
PARK



3.0 The Vision

A North Reading Growth Area has the potential to deliver well designed homes alongside significant areas of greenspace and enhanced community infrastructure, in a highly sustainable location, that minimises landscape and environmental harm.

The Vision

Over 100 ha of land to the east of Emmer Green and Play Hatch, on the north east edge of Reading District, provides the opportunity to create a North Reading Growth Area.

The North Reading Growth Area has the potential to deliver a well designed, beautiful place with beauty and place-making at its heart. It will enjoy significant areas of greenspace and enhanced community infrastructure, in a highly sustainable location, that minimises landscape and environmental harm.

Attractiveness, sustainability and quality will drive the design of the development to create a beautiful and sustainable place that celebrates the existing characteristics and context of this location, whilst responding to the challenges of climate change and the climate emergencies that have been declared in the South Oxfordshire and Reading authority areas.

This North Reading Growth Area offers the opportunity to deliver an urban extension to Reading with sustainability and exemplar design as core values and which places people, place and planet at the heart of its vision. It will:



Help meet local and regional housing needs.



Create a community that responds to and offsets the impact of the climate emergency.



Design with and for nature in response to the biodiversity emergency.



Deliver innovative transport and energy solutions in response to the energy crisis.



Peppard Road

Country Park

Kiln Road

EMMER
GREEN

Country
Park

CAVERSHAM
PARK

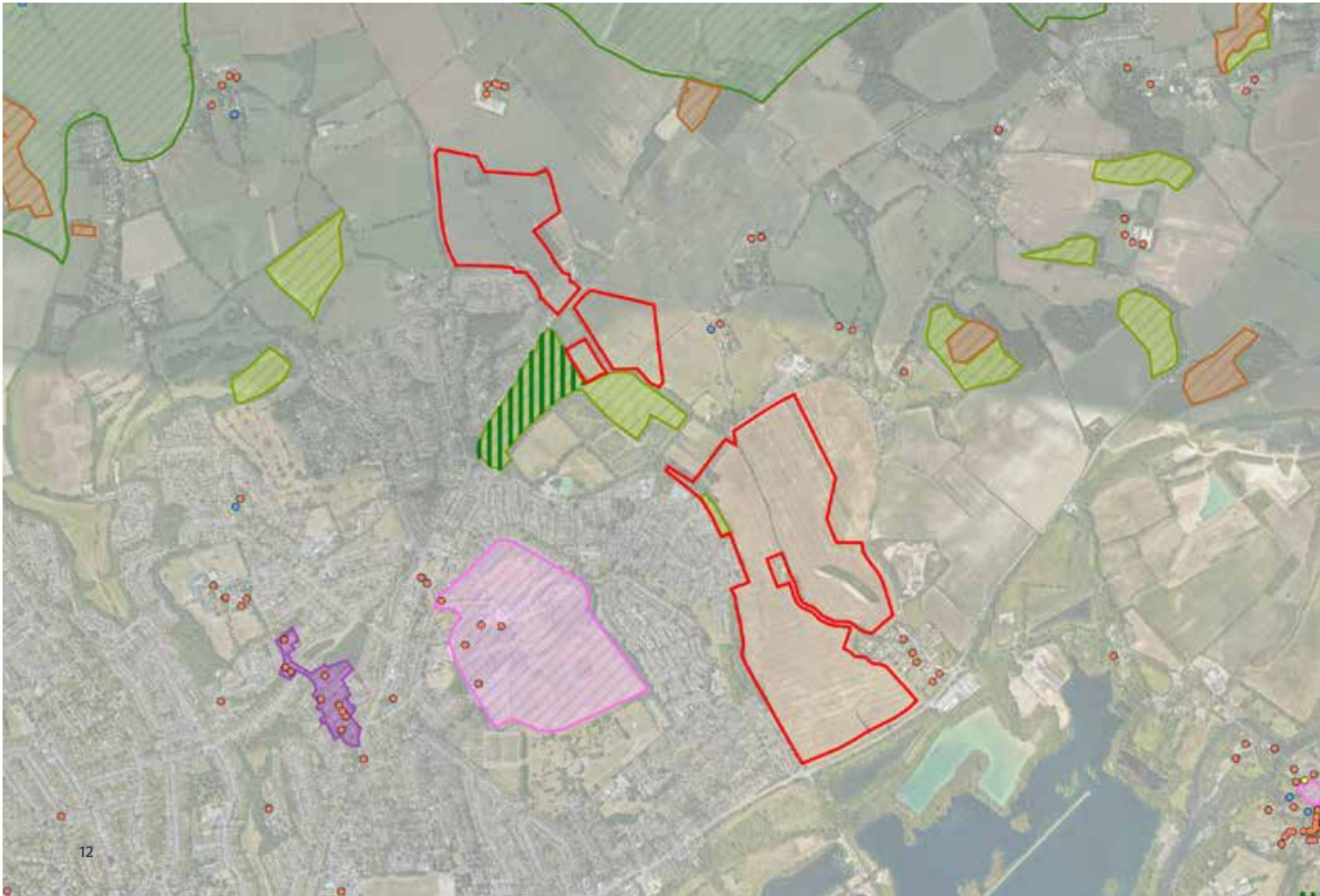
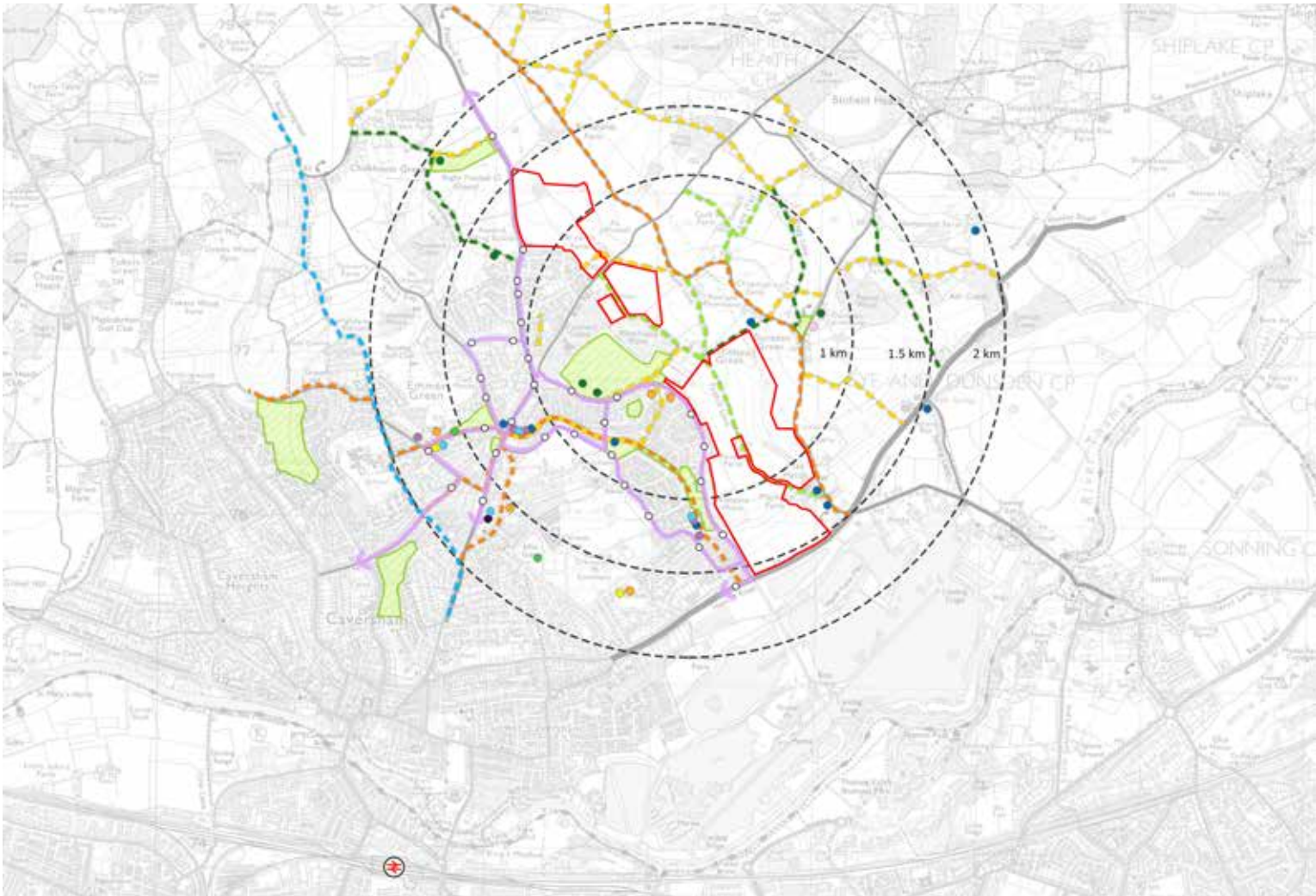




3.0 The Vision

The benefits

- 1,200 new homes for local people, including affordable homes, self-build and custom build housing.
- New Park & Ride facility off the A4155 Henley Road to reduce congestion and enhance sustainable transport.
- New Primary school for local children.
- New local centre accessible to the existing communities.
- Over 8km of new footpaths and cycle routes.
- A new Country Park accessible to all.
- 19 ha of new woodland and hundreds of new trees planted.
- 7 ha of new ponds, lakes and wetlands to store water and reduce flood risk
- New community orchards and food growing areas
- Over 3 ha of new play areas and playing fields
- Improved facilities at Caversham Park Playing fields



LOCAL FACILITIES

- Key
- Site boundary
 - Bus route & stops
 - Reading train station
 - Nursery
 - Primary school
 - Village hall
 - GP / Dentist / Pharmacy
 - Shop / Supermarket
 - Pub / Restaurant / Cafe
 - Petrol station
 - Sports facility
 - Allotment
 - Park / Public open space

4.0 Site context

A sustainable location

The area’s location on the northern edge of Reading makes it a highly sustainable location for growth. There are a good range of services and facilities nearby, including a Post Office/general store, primary schools, supermarket, GP surgery, pharmacy and village hall.

The sites can accommodate new homes within easy walking or cycling distance of amenities within the immediate locality and the Eye and Dunsden Parish area, as well as facilities in the neighbouring residential suburbs of Emmer Green and Caversham. In addition, the proposals will include new facilities, primary school and local centres accessible to existing and future residents further enhancing the sustainability of the area and minimising the need to travel further afield for day-to-day needs.

Existing public transport in addition to potential enhanced public transport and a park and ride facility will ensure that future residents of the development also have sustainable, reliable and quick means of access to rail services and a range of other facilities available in central Reading.

Avoiding sensitive landscape and heritage assets

The sites provide a unique opportunity to create an inherently sustainable and high-quality development, unconstrained by some of the environmental and policy designations that affect the development potential of other locations in the South Oxfordshire, Reading and Western Berkshire authority areas:

- The area is not covered by any landscape designations and would avoid the need to develop land in the Chilterns Area of Outstanding Natural Beauty (AONB) and Green Belt.
- The development of the land would not undermine the setting or significance of any heritage assets.
- Surveys have not identified any ecological constraints that would preclude residential development in this location and the proposals offer the opportunity to enhance biodiversity..
- The land could be developed to respect and enhance existing areas of ancient woodland, wildlife sites and local nature reserves.

LANDSCAPE & HERITAGE DESIGNATIONS

- Key
- Site boundary
 - Chilterns AONB
 - Local Nature Reserve
 - Conservation Area
 - Registered Parks and Gardens
 - Ancient Replanted Woodland
 - Ancient and Semi-Natural Woodland
 - Grade I Listed Building
 - Grade II Listed Building
 - Grade II* Listed Building

4.0 Site context

Minimising flood risk

Development areas will be located in areas of lowest flood risk and respond to the areas unique topography.

Existing water courses and routes of overland flow (after heavy rain) have been mapped to ensure these are retained and enhanced to improve their water holding capacity and ecological value.

Sustainable drainage schemes will use a network of new open water courses, ponds, lakes and wetland to convey and store water after heavy rain and so reduce the risk of flooding downstream, whilst creating new habitats for wildlife.

Responding to opportunities

Any development would be set within a robust framework of green infrastructure, including new structural landscaping and tree planting, to help assimilate new homes into their setting and the character of the wider surrounding area. This network of green infrastructure also has the potential to protect and enhance existing ecological features, and provide opportunities for formal and informal recreation.

The land could be sympathetically developed to enhance landscape character, and respect the Chilterns Area of Outstanding Natural Beauty to the north. The development of the sites would represent a logical and natural extension to the existing edge of Reading and the suburbs of Caversham and Emmer Green, to meet the housing needs of both South Oxfordshire, Reading and Western Berkshire market areas.

The development of the site also offers the opportunity to enhance the provision of local facilities and infrastructure. This includes the potential to provide for new community amenities and the potential to assist in the delivery of new transport infrastructure to the north of Reading, including a new Park and Ride facility.

DRAINAGE

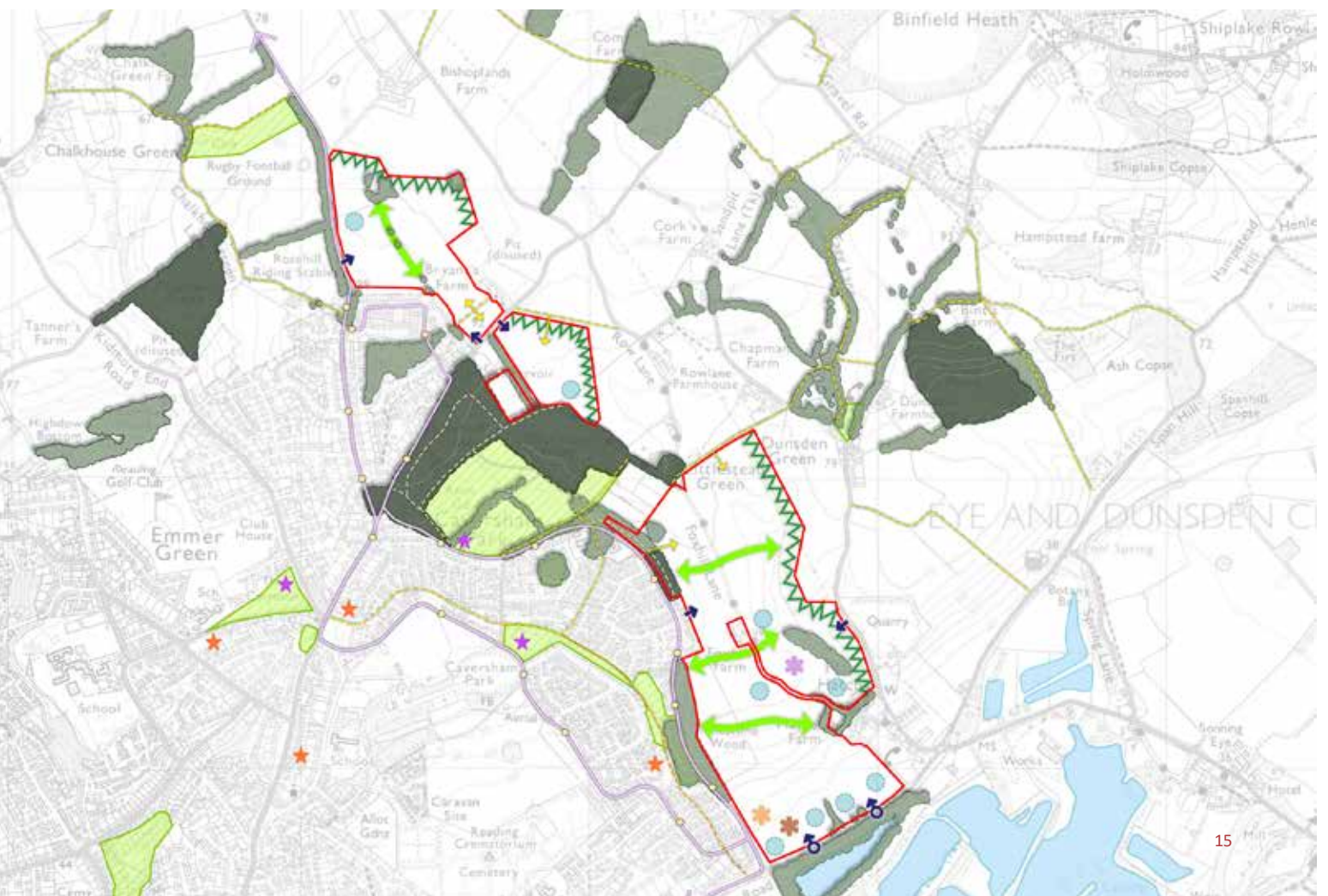
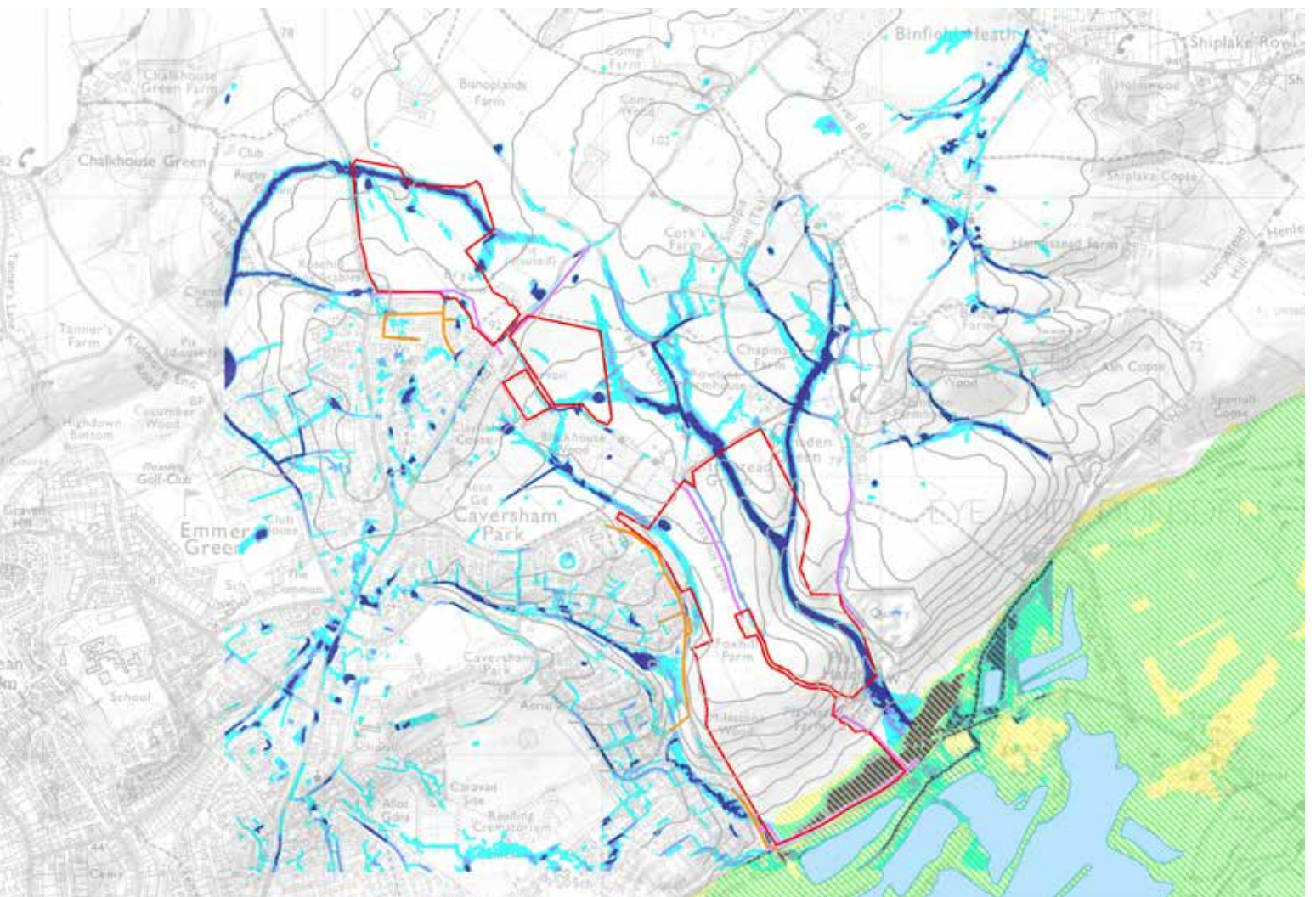
Key

- Site boundary
- Surface water sewers
- Distribution mains
- Flood zone 1
- Flood zone 2
- Flood zone 3
- 30 year surface water flood extent
- 100 year surface water flood extent
- 1000 year surface water flood extent
- Existing water bodies

ASSETS & OPPORTUNITIES

Key

- Existing woodland and trees
- Existing Ancient Woodland
- Existing recreational ground
- Existing water bodies
- Existing LEAPs
- Nearby shops
- Existing Public Right of Way
- Existing informal footpath / track
- Existing multi-use trail - 'Milestone Way'
- Existing bus route / stops
- Potential links to PROWs
- Potential vehicle access point
- Potential roundabout access point
- Potential SuDS attenuation areas
- Potential landscape buffer
- Potential green corridor
- Potential park & ride facility
- Potential local centre
- Potential primary school



5.0 Meeting planning need

Local Plan Context

The current South Oxfordshire and Reading Local Plans were adopted in December 2020 and November 2019 respectively.

South Oxfordshire District Council have now embarked on the development of a new joint Local Plan with Vale of White Horse District Council, which will extend to 2041. At present, the Councils do not consider that additional site allocations are required and do not propose to meet any further unmet housing needs arising from Oxford City up to 2041. Nonetheless, both Councils must recognise the inherent sustainability of locating growth directly adjacent the Reading town urban edge and administrative boundary which can help to deliver much-needed homes in the south of South Oxfordshire district and contribute to future unmet housing needs arising from Reading.

With this in mind, the Reading Local Plan was adopted in November 2019 and guides development between 2013 and 2036. The Local Plan meets an average delivery of 689 new homes per annum, leaving a shortfall of 230 dwellings up to 2036.

The Council have commenced work on their Local Plan Partial Update which will extend the plan period up to 2041. The standard method for calculating local housing need represents the starting

point for identifying local plan housing requirements and the figure for Reading Borough currently stands at 877 dwellings per annum, significantly higher than in the current Local Plan. It is therefore clear that unmet housing needs are to arise from Reading up to 2041 and beyond. It is likely that other Western Berkshire Housing Market Area authorities will not be able to accommodate their own needs to 2050 and therefore alternative strategies are required to ensure identified housing needs are delivered.

In this context, Play Hatch and Emmer Green located on the northern urban edge of Reading represent an inherently sustainable and logical location to accommodate further housing growth, in light of their combined functional links to the South Oxfordshire and Reading housing market areas, transport and employment hubs.

Eye and Dunsden Neighbourhood Plan

At a more local level, the Parish of Eye and Dunsden are currently in the early stages of preparing a Neighbourhood Development Plan. Once 'made', the Neighbourhood Plan will complement the adopted policies of the South Oxfordshire Local Plan.



6.0 Delivering affordable housing

South Oxfordshire and the neighbouring authority of Reading suffer from acute housing affordability issues and shortages in the supply of affordable homes. As a typical benchmark, mortgage lenders offer loan to income ratios up to a cap of around 4.5 times annual salary. However, in South Oxfordshire and Reading, the average lower quartile house price to lower quartile earnings ratio is currently 12.81, and 9.40 respectively, against a national England average of 9.48.

The Councils' affordable housing delivery records also show that there has been a shortfall in the delivery of affordable housing against identified local needs. Over the period 2011/12 (start of plan period) – 2022/23, a total of 2,948 affordable homes were delivered in South Oxfordshire at an average rate of 246 dwellings per annum, against an identified need of 386 units per year. In Reading, between 2013/14 (start of plan period) and 2019/20, a total of 1,051 affordable homes, at an average of 105 affordable units were completed per year in Reading, against an annual need of 406 dwellings per annum.

Development on the two sites would provide a policy compliant level of affordable housing in accordance with the South Oxfordshire Plan, alongside the provision of much needed market homes, to help tackle the affordability pressures in the region. A suitable mix of housing types would be provided as part of the development of the sites, to reflect existing and future market and affordable housing needs.



Peppard Rd

SUDS

Country Park

LEAP

Orchard

Kilm Road

Sport

NEAP

7.0 Building beautiful

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (NPPF 2023).

The delivery of high-quality, well-designed beautiful schemes is a key element of the vision for the development of the sites. Use of good design will ensure that an attractive and sustainable form of development is achieved, which positively contributes to its rural setting and the wider sustainability of the local area. The design of the developments will adhere to the ten characteristics of beautiful, enduring and successful places set out in the National Design Guide and will reflect the detailed guidance and design principles established in the National Model Design Code and the localised requirements of South Oxfordshire District Council.





Country
Park

LEAP

Orchard

NEAP

Sport

School

SUDS

LEAP

Wetland
Wildlife Area

Local
centre

Park &
Ride

Henley Road

8.0 Moving forward

Gladman are keen to engage with representatives of South Oxfordshire District and Reading Borough Councils, alongside other local stakeholders, to understand how the emerging proposals for North Reading could be optimised to meet local aspirations for growth and development. With this in mind, the proposals that are presented in this Vision Document have been provided as means to commence these conversations, including the details of potential dwelling numbers, supporting infrastructure and environmental benefits.

WHAT DO YOU THINK?

Thank you for taking the time to read through our proposal. We hope that it is clear that we are serious about community engagement, climate resilience, boosting the local economy and developing sites that promote beauty. Gladman believe that it is more important than ever to work with Councils, local decision makers and communities.

We are excited to engage in constructive conversation with yourself and invite you to contact

Peter Dutton at p.dutton@gladman.co.uk to begin this process.

01260 288 800

www.gladman.co.uk

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CW12 1LB





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mail@randallthorp.co.uk

randallthorp.co.uk



Goodchild, Helen

From: Helen Goodchild [REDACTED]
Sent: 07 November 2024 09:07
To: Planning Policy
Subject: Re: Reading Borough Local Plan – chance to comment on the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Warning!
For the attention of
RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

With the greatest respect, is there any point giving an opinion as 4500 objected to the Reading Golf Course development, they cut down loads of trees (not very carbon neutral), there will be a high increase in cars in an already pollution high Caversham. The developer appears to be king where RBC are concerned I'm afraid.

Thanks
Helen Goodchild

On Wed, 6 Nov 2024 at 12:23, Planning Policy <planningpolicy@reading.gov.uk> wrote:

Reading Borough Local Plan – chance to comment on the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Reading Borough Council is now consulting on the Local Plan Pre-Submission Draft Partial Update, November 2024 until 18th December 2024.

The Local Plan is a crucial Council planning document which will help inform decisions on planning applications up to 2041. The existing Local Plan was adopted in November 2019. We are in the process of updating the Local Plan to take account of recent changes to legislation, address the urgent need for more homes (including affordable homes), plan for associated infrastructure and ensure that sustainable development will help Reading achieve its net zero carbon ambitions. Once adopted, the Local Plan will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments until the 18th December 2024 during a period of public consultation. The Local Plan Pre-Submission Draft Partial Update document and supporting documents are on the Council's website at: <http://www.reading.gov.uk/localplanupdate>. Hard copies of the main documents can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours).

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Wednesday 18th December 2024. You may complete the [online questionnaire](#) to answer specific questions. Alternatively, you may respond more generally in writing by email or post. A model representation form is attached. These responses should be sent

to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Tuesday 26th November from 13:00 to 18:00 and Wednesday 11th December from 14:30 to 19:30.

At this stage, representations should focus on whether the plan is legally compliant, fulfils the duty to co-operate and meets the 'tests of soundness', as set out in paragraph 35 of the National Planning Policy Framework (NPPF). Following the public consultation, officers will take some time to consider the public's feedback before the Local Plan is to be submitted to the Secretary of State for examination.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

Planning Policy Team

Planning, Transport and Public Protection | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

Tel: 0118 9373337

Email: planningpolicy@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)

Gray, Susan

From: Susan Gray [REDACTED]
Sent: 18 December 2024 12:37
To: Planning Policy
Subject: Comments on Local Plan - No mention of Fobney Marsh - (Local Green Space - Public Open Space)

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

I would like to raise my concern that Fobney Marsh is not mentioned in the Local plan, this is an important area within Reading acting as a natural green space for the residents to walk and be within the natural environment. This is a uniquely open natural space (not a park or manicured area.) It provides clean air and a space away from the town.

Fobney Marsh provides a flood control area and any development or drainage of this land would therefore cause issues in other areas. It frequently floods in Autumn and Winter, and with rainfall expected to rise in the future it is important to maintain these areas for flood protection.

As part of Reading's response to the climate emergency and biodiversity crisis the land should also be treated as a carbon sink and unique nesting site for birds in the area .

This area provides the utmost importance to our town, Reading is densely populated and intensely urban and Fobney Marsh provides an accessible area for the residents who do not have **private transportation**

Attached Photo of birds spotted and Map of the area in question.



The following information is provided for your information only. It is not intended to be used as a substitute for professional advice. Please consult your professional advisor for more information.



Kind Regards
Susan Gray

[Redacted]

[Redacted]

Haynes, Trevor and Alison

Rejwerska, Marcelina

From: Haynes [REDACTED]
Sent: 18 December 2024 09:51
To: Planning Policy
Subject: Partial update to local plan

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear sirs

Please accept this email as written notification regarding your proposal Partial Update to Local Plan (Regulation 19), in response to questions 15 and 75. And the allotments current holding.

This has been an open space for many years and should remain so. I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unacceptable for many reasons. ALL the land should be granted Local Green Space status as it satisfies the criteria and is an important space for wild life the environment and the community. There are not enough green spaces in Tilehurst as it stands.

Regards

Trevor and Alison Haynes

[REDACTED]

Sent from my iPhone

Hazelton, Mark

(Response from webform)

Title: Mr

First name: Mark

Last name: Hazelton

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: All

Do you consider the Local Plan is legally compliant?: No

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: No

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The LGS (Local Green Space) status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)

I feel it is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them

It ignores all the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England

All of the land is vital to support the wildlife for hunting, breeding, foraging and refuge so it's flawed environmental reasoning to suggest that small areas of land of 'greatest importance for wildlife' would not be adversely affected by development of broader hunting, foraging grounds. Some species - bats and birds - identified predominantly in skies around the builders yard and on Armour Hill

There is also a stark contrast between what is expected to be provided for granting LGS designation to these sites compared to that of previous designations (like the Victoria Rec and the allotments) and the new additional proposed LGS in this partial plan update of the Ibis Sports Club (a private club with playing fields adjacent to RBC owned Rivermead centre

The site adjacent to Kentwood Hill/Armour Road is an important local green space that provides refuge to disappearing English wildlife, and should be classed as LGS not suitable for residential development.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

The LGS (Local Green Space) status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably

close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)

It is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them

RBC must consider the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England. The site owners are not allowing a separate wildlife audit.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Mark Hazelton

Hicks, Steve

Rejwerska, Marcelina

From: Steve Hicks [REDACTED]
Sent: 16 December 2024 09:06
To: Planning Policy
Subject: Re: Local Plan partial update consultation response
Attachments: Document1.docx

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Planning

Please find my repeat justification for reallocating the whole of sites WR3s and WR3t from residential to local green space for submission to the planning inspectorate. The importance of protecting this land from development remains a key priority for local people and our endangered wildlife habitats against a national housing development program that is disjointed, disorganised and will do nothing to help the majority of British people in need secure homes.

Kind regards

Steve Hicks

[REDACTED]

Rejwerska, Marcelina

From: Steve Hicks [REDACTED]
Sent: 18 December 2024 09:59
To: Planning Policy
Subject: Local Plan partial updatesites WR3s and WR3t

Warning ! For the attention of RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Planning Policy

As regards the Partial Update to the Local Plan (Regulation 19), in response to questions 15 and 75, I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound.

For the reasons set out in my letter of 30/01/2024 and sent again by email yesterday I believe that ALL the land should be granted Local Green Space status.

This is because it satisfies all the qualifying criteria and is the only way to ensure all the valid reasons for protecting the habitat and valuable green space can be ensured.

Kind regards

Steve Hicks
[REDACTED]

Consultation response to Local Plan partial update

30/01/2024

Steve Hicks

Dear Sir or Madam

I am writing to you in connection with the above Local Plan partial update consultation and with specific reference to the Land at Kentwood Hill and Armour Hill, site allocations WR3s and Wr3t respectively.

You will no doubt be aware of widespread local community interest and support for the retention of these area as protected wildlife habitats from previous petitions, representations, public meetings and cross party Councillor and MP involvement as well as evidence based acknowledgement and support from environmental and wildlife groups such as Globe, BBONT, Badger Trust and Thames Valley Environmental Records Centre (TVERC) and the local active Keep Kentwood Green (KKG) lobby group.

You will have my previous written submissions on file setting out my support and justification for protecting this much valued, unique and rare area of unspoilt open space and a wildlife haven as well as the unique character it provides to the local area, and I would kindly refer you to them as supporting context to this consultation response.

I have set out my specific consultation responses below under Q15 and Q75 of the consultation and drawn a brief conclusion at the end of this letter which I hope ~~demonstrates that the sites qualify as local green space and are not necessary for housing supply.~~

Q15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space (LGS)?

I consider that both sites qualify as local green space because they are:

- a) in close proximity to the community they serve
- b) demonstrably special to the local community and hold particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land

The local community of Tilehurst benefits for and is therefore served by these two sites, the beneficiaries being local residents, allotment plot holders, dog walkers, regular bypassers and those who appreciate and benefit for the mental wellbeing of green spaces and interlinked wildlife corridors and areas.

This is evidenced by the strong local support given to preserving these sites in the form of petitions, representations, public meetings and cross party Councillor and MP involvement.

These sites are the only pocket of undisturbed wildlife habitat in Tilehurst, located within a suburban area and enjoyed as significant wooded areas for their visual and functional amenity value.

Council officers supported the view when the Area Tree Preservation Order (TPO) was confirmed on the land in March 2022 that “.... *the land has an overall green, treed appearance providing amenity value to the street scene.....and provide amenity value to those residents living adjacent to the land*”.

You will be aware of how the local community consider the sites special. KKG has over 643 members, a previous petition in Feb 2022 to keep the land as a wildlife haven attracted over 1,100 signatures and a previous public meeting arranged by Ward Councillors in the local village hall attracted circa 150 local residents.

Over 100 different species have been seen or heard in or above WR3s and WR3t and the Builders Yard and logged with TVERC. This data was used in the successful bid to get the whole area listed as a Local Wildlife Site.

The land owner Tilehurst Pools Land Charity have refused independent access into the land for surveys so the range of flora and fauna biodiversity is potentially much greater.

In terms of richness of the wildlife, 22 of the protected species or species of special concern listed in the Councils Biodiversity Action Plan have been noted on the sites and officially recorded by TVERC.

These include badgers, hedgehogs, slow worms, stag beetles, 6 species of bats, owls, deer and kites, all of which as a local resident I have seen in the vicinity of the site and links to Arthur Newbury Park.

The Badgers Trust have been verified that the main sett on this site is situated within WR3s with satellite setts and pathways found throughout all the land surrounding the allotments and Victoria Rec. This is very rare for such an urban area.

Without WR3s and WR3t left as wild, green space the biodiversity enjoyed by the wider community would be at risk. The recognised protected Areas of Biodiversity Interest of the Withies, McIlroy Park, land at the end of Armour Hill and Arthur Newbery Park would be hugely impacted by allowing houses to be built on WR3s and WR3t, thus losing these wildlife corridor link corridors.

The unique local characteristic of these 2 sites is that they are not publicly accessible so the wildlife can thrive in these only areas in Tilehurst undisturbed by people. If these sites are not also given the same level of protection, then the biodiversity in the area will disappear. Habitats are as important, if not more so, than corridors to the wildlife and are unique and beneficial to the local area and local community.

Another recognised characteristic of Local Green Space that applies to both WR3s and WR3t is their vital contribution to the tranquillity, character and wellbeing of the local area, giving a real appreciation of nature and a sense of countryside - a rare, precious and diminishing commodity in an otherwise ever expanding suburban area. Local residents value its multiple benefits for well-being and health - contact with wildlife in town, visual amenity and aspect and a sense of space.

In the Councils 2018 document “Local Green Space and Public Open Space Background Paper” local green space status was awarded to the Victoria Road Recreation Ground and Kentwood Hill Allotments as “....one of the most valued green spaces in the west of Reading and provides sports pitches and allotments, as well as habitat for wildlife”.

Sites WR3s and WR3t are intrinsic to this and should have been included in the designation.

Q75: What is your view on the suggested changes to sites WR3s and WR3t?

There is a recognised housing need in Reading with an increase from 689 to 877 homes pa up until referred to on page 8 of the Partial Update. This is an increase in demand of 3,196 homes (188 pa over the intervening period until 2041

This increased need can be met with the additional sites proposed from the latest Call for Sites as well as the included increased volumes in previously nominated sites as shown below.

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	Vol
CR12a	Cattle Market	volume change	330-490 to 800-1200	705
CR13c	Forbury Business Park	volume change	190-285 to 430-450	339
Cen3	John Lewis	new	200	200
Cen5	Norman Place	new	240	240
Cen6	Reading Bridge House	new	300-400	350
Cen7	Tesco Extra	new	150-200	175
Cen8	Kennet Place	new	70	70
Cen9	Sapphire Plaza	new	250-400	325
Cen10	Reading College	new	45	45
Sou1	Reading Link	new	200	200
Sou2	Tunbridge Jones	new	72-96	84
Sou3	Drake Way	new	23	23
Sou4	Green Park Village	new	50	50
Eas1	Upper Crown St	new	46	46
CA1b	Reading Golf Club	volume change	90-130 to 223	113
W	West Reading	Detailed separately		268
			Average Increase	3233

As regards the West Reading and Tilehurst area an increase in volumes of dwellings even with the deselection WR3s and WR3t is still significant, as shown below:

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	
WR3c	28-30 Richfield Avenue	change of use	loss of 50 - 80	-65
WR3e	Yemony House	change of use	possible loss of 10 - 14	-12
WR3j	Moulsford Mews	volume change	max from 16 - 26, plus 10	10
WR3m	103 Dee Road	volume change	max from 50 - 54, plus 4	4
WR3o	The Meadway Centre	change of use	+258 residential	258
WR3s	Land at Kentwood Hill	change of use	41 - 62	-52
WR3t	Land at Armour Hill	change of use	12 - 18	-15
Wes1	Milford Road	new	+70	70
Wes2	72 Berkeley Avenue	new	+20-30 (could be up to 35)	25
Wes3	132-134 Bath Road	new	approx 30 (could be up to 44)	30
Wes4	234 Southcote Library	new	+15	15
			Effect of all changes	268

There are also developments not included in the Local Plan or Partial Update that will increase housing numbers such as the Tesco car park on Portman Road (80 dwellings), redevelopment of the Curzon Club (30 dwellings) completion of Downing Road (5 dwellings) as well as doubtless continued infill and backland 'windfall' development opportunities.

Also as demand cannot be accurately forecasted and the Government has moved away from Local Plan led housing targets it could be argued that fulfilling market demand and policy delivery and are academic.

We will never build enough housing as demand is infinite.

The Councils Local Green Space and Public Open Space Background Paper March 2018 stated that

"...LGS designation was introduced by Government in 2012, it is absent in existing Reading planning policy documents and is being proposed in this iteration of the Local Plan for the first time."

Deallocating a potentially surplus residential development to LGS status would evidence this policy shift and is not without precedent.

Reallocating the sites as LGS helps the Council meet its Climate Emergency objectives, zero carbon policy and biodiversity net gain requirements which all carry planning weight.

Changing designation is in line with RBC policy EN12 – Biodiversity and the green network.

Including WR3s and WR3t as LGS is supported by policy EN14 – Trees, hedges, and woodland. A TPO had been in place since September 2000 on 12 specific individual trees, 2 groups of trees and 5 areas of trees and an Area TPO was served in March 2022 to protect all of the trees.

The majority of the roadside perimeters of the sites are made up of dense trees and mature hedgerows. Many of the trees would be considered veteran and there are many examples of mature ash trees with no evident die back.

Also to be considered is the impact that any development would have on the Major Landscape feature contained within WR3s, "the West Reading Wooded Ridgeline" recognised for its value and characterised by its amenity value, largely as a result of its collective tree cover.

Changing the designation of sites WR3s and WR3t meet some of the Councils Sustainability Framework objectives.

Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land.
Sites WR3s and WR3t are green field

Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects on designated wildlife sites. Well over 100 different species have been recorded

Objectives 1, 2 and 9 are also relevant. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill.

Objective 2 - there are a number of underground streams that run through WR3t, and this

area has historically been used to grow watercress. Objective 9 relates to clean environments and site are not accessible to human activity.

All the above points under this Question 75 have material planning policy weight and should be assessed in the planning balance when considering residential deallocation and LGS protection.

I hope I have demonstrated that the reallocation of sites WR3s and WR3t from residential development to protected local green space:

has strong local community support

meets the necessary criteria

has support from a range of professional organisations and authoritative bodies

protects a long established and unique woodland wildlife habitat

is not detrimental to housing supply

is not without precedent

supports other Planning and Council policies

Kind regards

Steve Hicks

[Redacted signature]

Historic England

(Response from webform)

Title: Mr

First name: Guy

Last name: Robinson

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: CR14n

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As stated in our letter, we assert policy CR14n is unsound because it appears to rely solely on archaeological investigation as a way to avoid harm to the Scheduled Monument. This is unlikely to be effective, because it omits reference to archaeological desk-based assessment, and fails to connect with the potentially positive role of development in heritage terms. Rather than simply aiming to avoid harm, there is the opportunity to set out a positive strategy for the conservation and enjoyment of the historic environment, as required by the NPPF.

We recommend reference to heritage impact assessment as the mechanism through which place-shaping can most effectively be delivered. This site provides a rare opportunity for enhancement, with the potential to foster greater appreciation of the Holy Brook, the Abbey Quarter (which currently it turns its back on) and any archaeological remains associated with the Abbey. This needs very careful handling, which the current policy does not fully articulate. We suggest revised wording for consideration, including reinforcing the need for Scheduled Monument Consent and the need for early engagement with Historic England.

To better align with the NPPF, we advise referring to a Scheduled Monument, rather than a scheduled ancient monument, and “harm” rather than “detrimental effects”.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Development should:

- Take measures to avoid or minimise any harm to the Scheduled Monument by ensuring sensitive scheme design that is informed by archaeological desk-based assessment, followed by adequate archaeological investigation where necessary. Scheduled Monument Consent will be required if a proposal affecting a Scheduled Monument constitutes ‘works’, as defined by the Ancient Monuments and Archaeological areas Act 1979. Early engagement with Historic England is required. Where significant remains are present, there is a presumption in favour of their preservation in-situ. Proposals should

deliver heritage benefits. Heritage impact assessment is needed to support effective place-shaping that reinforces links between the site, the Holy Brook and the Abbey Quarter;

- Avoid harm to the setting of the Conservation Area;"

Please upload any supporting information (if necessary).

https://reading.govocal.com/uploads/f737bddd-6c0f-4be6-a1e3-c28dfb45dbf4/idea_file/file/0f473737-4427-489b-b024-aca37b80f142/20241218_ReadingLP_update_Reg19_HE_GR_response.pdf

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary: We have endeavoured to be constructive in our review and would welcome the opportunity to engage with the Council in preparation of a Statement of Common Ground. If it is not possible to reach agreement on any or all of the issues, we would wish to participate in the relevant hearing session to explain and clarify our concerns, if necessary; to take part in any discussions on the matter; and to answer any questions the Inspector may have.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Author name: Guy Robinson



Historic England

FAO:
The Planning Policy team
Reading Borough Council
planningpolicy@reading.gov.uk
by email only

Our ref: PL00793027

18 December 2024

Dear Planning Policy team

Reading Borough Council's Local Plan Partial Update: Regulation 19

Thank you for consulting us about Reading Borough Council's Local Plan Partial Update (Regulation 19). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

There is much in the plan that we support. Our detailed comments are attached as an appendix to this letter.

In this cover letter, I highlight one policy to which we currently object and other matters about which we have significant interest. The latter are concerns that we wish to raise with the Council alongside a request that we liaise about these points prior to the plan's examination.

CR14n: Reading Central Library: currently we object to this policy because implementation of the policy as worded is unlikely to be effective in heritage terms and does not represent a positive strategy for the historic environment as required by national policy. We suggest revised wording for consideration, including the need for early engagement with Historic England.

Terminology

As a general comment, there are several occasions where allocation policies refer to detrimental effects [to the historic environment]. We recommend referring to "harm" to align with the terminology used in the NPPF. Similarly, to align with the NPPF, we advise referring to Scheduled Monuments, rather than scheduled ancient monuments, and Registered Parks and Gardens rather than historic parks and gardens.



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Tall Buildings

We note that the Council has introduced new areas of less suitability for tall buildings. We support the Council's efforts to determine where in Reading is more suitable, less suitable and unsuitable for tall buildings.

We would be interested to see the evidence underpinning the areas of less suitability.

Having introduced such areas, we take this opportunity to raise a proposal with the Council: the area north of King's Road is not an optimal area for tall buildings. In our detailed comments, we suggest recategorizing that subsection of the eastern cluster as an area of less suitability for tall buildings.

CR13a Reading Prison

We welcome the heritage-led approach being taken by the Council and encourage the Council to consider requiring a heritage-led development brief for the site. Our main outstanding concern relates to what 10,000m² of mixed use means in practice in terms of massing, form and density. Without a clear idea of what this means, we cannot be confident in what will be achieved, including the Council's heritage aspirations. Within our comments, we recommend the policy requires early engagement with Historic England.

CR15: The Reading Abbey Quarter

We recommend the policy refers to avoiding unacceptable harm to the historic environment and requires early engagement with Historic England.

We have endeavoured to be constructive in our review and would welcome the opportunity to engage with the Council in preparation of a Statement of Common Ground. If it is not possible to reach agreement on any or all of the issues, we would wish to participate in the relevant hearing session to explain and clarify our concerns, if necessary; to take part in any discussions on the matter; and to answer any questions the Inspector may have.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, RTPI
Historic Environment Planning Adviser
Development Advice – London and the South East Region
guy.robinson@historicengland.org.uk



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Appendix A: Table of Historic England's comments on the proposed Reading Local Plan partial update (Reg 19)

The page numbers cited are from the version of the local plan without tracked changes

Page	Section	Sound/ Unsound	Comments	Suggested Change
20-22	Policy CC2: Sustainable Design and Construction	Sound		
23	Paragraph 4.1.5	Comment	We welcome this paragraph.	
23 / 24	Policy CC3: Adaptation to climate change	Sound	Note there is a typo: "colling"	
24	Paragraph 4.1.7	Comment	Climate change also effects the historic environment. We suggest this is acknowledged in this paragraph.	"...There will also be significant impacts on biodiversity and the <u>historic and</u> natural environment. Applicants must seek a good understanding of future climate risk and incorporate these risks into designs from the outset."
27	Paragraph 4.1.20	Comment	While we welcome this paragraph on archaeological remains, might it be expanded also to refer to the need to consider potential impacts on the setting of heritage assets? We suggest possible wording for consideration.	" <u>Decentralised energy infrastructure has the potential to impact on the significance of heritage assets, including their setting. Such impacts should be assessed via proportionate heritage impact assessment, as appropriate.</u> Due to the underground nature of heat networks, particular attention should be paid to any possible archaeological impacts as detailed in Policy EN2: Areas of Archaeological Significance."



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Page	Section	Sound/ Unsound	Comments	Suggested Change
28 / 29	Policy CC7: Design and the Public Realm	Sound		
33 / 34	Policy CC9: Securing infrastructure	Sound	We support the clarifications in this policy pertaining to cultural infrastructure.	
37	Title of section 4.2	Comment	We recommend amending the title of this section to align with paragraph 8 of the NPPF and recognise that the built environment is not synonymous with the historic environment.	"Built, <u>Historic</u> and Natural Environment"
40	Paragraphs 4.2.10 and 4.2.11	Comment	We suggest amending terminology to Scheduled Monuments to align with the NPPF. Also, we suggest referring to Registered Parks and Gardens (RPGs) when that is meant rather than historic parks that are not on the national register.	Paragraph 4.2.10: "...Heritage assets may be formally designated as being of national importance or of local importance and may include listed buildings, conservation areas, S scheduled ancient <u>M</u> onuments..." Paragraph 4.2.11: <ul style="list-style-type: none"> "Two Scheduled Ancient Monuments (Reading Abbey, including the Civil War earthworks and Reading Gaol, and High Bridge); Five Historic <u>Registered</u> Parks and Gardens;..."
40 / 41	Policy EN1: Protection and Enhancement of the Historic Environment	Comment	We are approaching reference to historic parks and gardens in this policy as applying to RPGs <u>and</u> other historic parks and gardens of local or regional interest. If the policy is intended to focus only on those parks and gardens on the register maintained by Historic England, these two references in the policy should be changed to Registered Parks and Gardens.	
42 - 47	Policies EN2 – EN6	Sound		



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Page	Section	Sound/ Unsound	Comments	Suggested Change
45	Paragraph 4.2.21	Comment	<p>While we are comfortable with policy EN4, we are not entirely clear about paragraph 4.2.21, relating to the scope of policy EN4.</p> <p>We had interpreted policy EN4 as having a relatively wide scope. Regrettably, we are unclear about its scope in light of paragraph 4.2.21. Surely when identifying buildings of townscape merit, the expectation is that they are locally important?</p> <p>We believe that either the text of paragraph 4.2.21 or the title of policy EN4 needs to change, perhaps both.</p>	
63 / 64	Policy EN14: Trees, Hedges and Woodlands	Comment	<p>We welcome many of the proposed changes and suggest a minor amendment to the reference to heritage impacts from planting, which does not fully recognise the potential to harm archaeological remains, nor fully align with supporting paragraph 4.2.84.</p> <p>The level of impact of new tree planting on archaeology should be assessed on a case-by-case basis.</p>	<p>“5...</p> <p>b. Planting should consider the historic environment as appropriate, <u>assess archaeological potential in advance of landscape designs and planting schemes</u> and avoid potential future harm to designated heritage assets <u>(in accordance with policies EN1 – EN6);</u>”</p>
87 / 88	H2: Density and mix	Comment	<p>We note the Council is proposing a significant increase in density – especially in the town centre. While we do not dispute the merits of intensifying development in the most sustainable locations, we do have a concern about the degree to which these minima figures take account of impacts on the historic environment. Mitigating these concerns, we welcome the proposed exception clause, and thus we do not object:</p> <p>“Exceptions to the minimum densities will apply where achieving that density would:</p> <ul style="list-style-type: none"> • Cause unacceptable harm to a designated heritage asset or its setting;” 	
157	CR2: Design in central Reading	Sound	Note typo: “prioritised” in the final sentence.	
166 - 168	CR10: Tall Buildings	Comment	<p>We note that the Council has introduced new areas of less suitability for tall buildings. We support the Council's efforts to determine where in Reading is more suitable, less suitable and unsuitable for tall buildings.</p> <p>That said, we encourage the Council to consider recategorizing the area north of King's Road in the eastern cluster (CR10c) from an area suitable for tall buildings to an area of less suitability. We assert that the area north of King's Road is not an ideal location</p>	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>for tall buildings, given the potential for archaeological remains linked with the former Abbey, which could be impacted by the piling required for tall buildings, and the proximity to designated heritage assets (with potential to affect their setting) such as the former Abbey ruins, the Grade I Abbey Gate and Forbury Gardens (Grade II Registered Park and Garden).</p> <p>Looking at the Council's Tall Buildings Strategy, the view from Forbury Gardens of the Grade I Abbey Gate is flagged as important, but the existing tall building (The Blade) behind it harms that view. This subsection of the eastern cluster connects with the Abbey through the Scheduled ruins and the Holy Brook and, in our opinion, should be considered more sensitively.</p> <p>We would be interested to learn more about the evidence underpinning the areas of less suitability for tall buildings.</p>	
169	Paragraph 5.3.37	Comment	We recommend expanding the opening of paragraph 5.3.37 as suggested.	<u>"It is vital that, given their prominence and the potential for them to impact on the setting of heritage assets, new tall buildings are of the highest architectural quality..."</u>
172 - 175	CR11b Greyfriars Road Corner	Comment	We recommend integrating reference to the Grade I church opposite this site, noting the potential for the site's development to affect this highly designated listed building.	<u>"There will be active retail and leisure uses on the ground floor along Friar Street, with a mix of uses on higher floors and in the rest of the area. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road and Greyfriars Church (Grade I) will require careful design treatment."</u>
180	CR12d: Broad Street Mall	Comment	Reference should be made to the (many) heritage assets nearby, including the Grade I Church of St. Mary. We recommend wording for consideration.	<u>"...Alternatively, a development which retains the existing mall with additional development above may be appropriate where it improves the quality of the existing mall frontages. <u>Proposals should respond sympathetically to the significance of nearby heritage assets, including (but not limited to) the Church of St. Mary (Grade I) and St Mary's Butts and Castle Street Conservation Area.</u>"</u>
180	CR12e: Hosier Street	Comment	Reference should be made to the (many) heritage assets nearby, including the Grade I Church of St. Mary. We recommend wording for consideration.	<u>"... The car parking below ground level will be retained and incorporated into the development. <u>Proposals should respond sympathetically to the significance of nearby heritage assets, including (but not limited to) the Church of St. Mary (Grade I) and St Mary's Butts and Castle Street Conservation Area.</u>"</u>
183 - 185	CR13: East Side Major Opportunity Area	Comment	Criterion v would benefit from several minor amendments:	<u>"(v) Conserve and enhance the <u>significance of the listed buildings in the area, Reading Abbey sScheduled ancient monument and Forbury Registered Park and Garden</u> historic garden in the area and their settings where possible;"</u>



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			<ul style="list-style-type: none"> referring to the assets' significance (rather than risk focusing solely on their fabric), referring to a Scheduled Monument (rather than scheduled ancient monument) to align with the NPPF; also, we assert adding "Reading Abbey" could be a helpful identifier, connecting its multiple sites in the area; and Forbury Registered Park and Garden to acknowledge that it is on the national Register. <p>We suggest revised wording for consideration.</p> <p>In CR13a, we recommend referring to Reading Abbey Scheduled Monument, rather than a scheduled ancient monument. This roots the wording in the local context and connects with the NPPF terminology.</p> <p>Focusing on plans for the prison, we have a detailed interest in what 10,000m² might look like. Currently this is unclear, in terms of massing, form and density. While we support the proposed heritage-led approach, we wish to be involved in detailed discussions as they develop and request that reference be made in policy to early engagement with Historic England.</p> <p>We recommend the Council considers adding the need for a development brief for this site.</p>	<p>CR13a Reading Prison:</p> <p>"...The site is part of <u>Reading Abbey a Scheduled ancient mMonument</u>, and therefore any additional development will be dependent on a thorough demonstration that it would not have detrimental impacts on the significant archaeological interest, <u>informed by early engagement with Historic England...</u>"</p>



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187	Paragraph 5.4.28	Comment	Given the sensitivity of the site, we recommend the local plan explicitly refers to proportionate heritage impact assessment, which provides the mechanism through which proposals can be considered.	“...Reading Prison is a highly constrained site, and the Framework contains much more detailed information on these issues and how they should be addressed. It is important that options for uses that may secure the future of the listed prison building are kept open at this stage but a cultural, heritage or leisure use that is in accordance with the historic importance of this building should be the focus <u>informed by proportionate heritage impact assessment.</u> ”
189	CR14d 173-175 Friar Street and 27-32 Market Place	Comment	We recommend a slightly revised formulation of wording that more explicitly picks up the need to consider listed buildings (plural) within the site and also nearby buildings (which include the Grade I Church of St Laurence).	“Development should: <ul style="list-style-type: none"> • Avoid harm to detrimental effects on the significance <u>(including the settings)</u> of the listed buildings <u>within and adjacent to the site</u> and the Conservation Area and their settings;...”
190	CR14g The Oracle Riverside East	Comment	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	“Development should: ... <ul style="list-style-type: none"> • Avoid detrimental effects on <u>harm to</u> the significance of listed buildings and the Conservation Area and their settings;”
190	CR14i Enterprise House, 89-97 London Street	Comment	We advise a slightly revised formulation of wording that more explicitly picks up the need to consider listed buildings (plural) within the site and also nearby buildings. We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	“Development should: <ul style="list-style-type: none"> • Avoid harm to detrimental effects on the significance <u>(including the settings)</u> of the listed buildings <u>within and adjacent to the site</u> and the Conservation Area; • Address noise impacts on residential use; and • Address air quality impacts on residential use.”
191	CR14i 187-189 Kings Road	Comment	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF. Also, we recommend referring to listed buildings plural, noting the potential to affect the setting of nearby listed buildings.	“Development should: <ul style="list-style-type: none"> • Avoid harm to detrimental effects on the significance of the listed buildings and the Conservation Area;”



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192	CR14n: Reading Central Library	Object	<p>We assert the policy is unsound because it appears to rely solely on archaeological investigation as a way to avoid harm to the Scheduled Monument. This is unlikely to be effective, because it omits reference to archaeological desk-based assessment, and fails to connect with the potentially positive role of development in heritage terms. Rather than simply aiming to avoid harm, there is the opportunity to set out a positive strategy for the conservation and enjoyment of the historic environment, as required by the NPPF.</p> <p>We recommend reference to heritage impact assessment as the mechanism through which place-shaping can most effectively be delivered. This site provides a rare opportunity for enhancement, with the potential to foster greater appreciation of the Holy Brook, the Abbey Quarter (which currently it turns its back on) and any archaeological remains associated with the Abbey. This needs very careful handling, which the current policy does not fully articulate. We suggest revised wording for consideration, including reinforcing the need for Scheduled Monument Consent and the need for early engagement with Historic England.</p> <p>To better align with the NPPF, we advise referring to a Scheduled Monument, rather than a scheduled ancient monument, and “harm” rather than “detrimental effects”.</p>	<p>“Development should:</p> <ul style="list-style-type: none"> Take measures to <u>avoid or minimise prevent any harm to detrimental impact on the Scheduled ancient mMonument by ensuring sensitive scheme design that is informed by archaeological desk-based assessment, followed by adequate archaeological investigation where necessary. Scheduled Monument Consent will be required if a proposal affecting a Scheduled Monument constitutes ‘works’, as defined by the Ancient Monuments and Archaeological areas Act 1979. Early engagement with Historic England is required. Where significant remains are present, there is a presumption in favour of their preservation in-situ. Proposals should deliver heritage benefits. Heritage impact assessment is needed to support effective place-shaping that reinforces links between the site, the Holy Brook and the Abbey Quarter;</u> Avoid <u>harm to detrimental effects on the setting of the Conservation Area;</u>”



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193	CR14r John Lewis Depot, Mill Lane	Comment	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	<p>“Development should:</p> <ul style="list-style-type: none"> • Avoid harm to detrimental effects on the setting of listed buildings and the Conservation Area; • Take account of potential archaeological significance;”
193	CR14s 20-22 Duke Street	Comment	<p>We recommend referring to avoiding or minimising “harm” rather than preventing “detrimental effects” to align with the terminology in the NPPF.</p> <p>To better align with the NPPF, reference should be made to a Scheduled Monument, rather than a scheduled ancient monument.</p>	<p>“Development should: ...</p> <ul style="list-style-type: none"> • Take measures to <u>avoid or minimise harm to prevent any impact on the Scheduled ancient Monument</u>; • Avoid harm to detrimental effects on the setting of listed buildings and the Conservation Area; • Take account of potential archaeological significance;”
194	CR14t: Aquis House, 41-9 Forbury Road	Comment	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	<p>“Development should: ...</p> <ul style="list-style-type: none"> • Avoid harm to detrimental effects on the setting of listed buildings and the Conservation Area; • Take account of potential archaeological significance;”
194	CR14u 33 Blagrove Street	Comment	We encourage the Council to be more demanding and clearer in the design contribution that this site should make to the conservation area, using the language used in policy EN3. Reference should be made to the nearby Town Hall (Grade II*).	<p>“Development should:</p> <ul style="list-style-type: none"> • <u>Contribute positively to the character and distinctiveness of Enhance the Conservation Area where possible and respond sympathetically to the significance of Reading Town Hall</u>; • Take account of potential archaeological significance;”
197	CR14ab 160-163 Friar Street	Comment	The site is sensitive from a heritage perspective, especially noting its proximity to the Town Hall (Grade II*). This should be acknowledged in policy.	<p>“Development should:</p> <ul style="list-style-type: none"> • <u>Avoid harm to the settings of listed buildings and the Conservation Area</u> • Address air quality impacts on residential use; and • Address noise impacts on residential use.”



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200	CR15: The Reading Abbey Quarter	Comment	<p>While we broadly support this policy, reference to links between the Abbey Quarter and the Prison need to acknowledge the potential for impacts on heritage significance.</p> <p>As stated in our response at Regulation 18, gaps in the prison wall may be possible, but they will need to be limited, and carefully positioned, both to prevent negative impact on the significance of the listed prison, and to enhance understanding of the Abbey ruins and below-ground remains. There is scope to deliver heritage benefits, which the policy should encourage. We recommend also referring to the need for early engagement with Historic England.</p>	<p>“The Abbey Quarter should be considered in the context of the adjacent historic Reading Prison site identified in policy CR13, which represents an opportunity to further consolidate the cluster of heritage interest and cultural setting of The Abbey Quarter. The areas should link into and complement one another, providing public access via the linkages where possible <u>without unacceptable harm to heritage significance, informed by early engagement with Historic England. Proposals should deliver heritage benefits.</u>”</p>
201 / 201	CR16: Area to the north of Friar Street and east of Station Road	Sound		
242	CA1c Land at Lowfield Road	Comment	<p>We welcome the proposed changes to this policy. For extra clarity, we recommend flagging that Caversham Park is a Registered Park and Garden.</p>	<p>“Avoid detrimental visual effects on the North Reading Dry Valleys and Chilterns Escarpment major landscape feature and on Caversham <u>Registered Park and Garden</u>; and”</p>
245 / 246	CA2: Caversham Park	Sound		



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253	ER1i 261-275 London Road	Comment	For complete clarity we suggest using the phrase "Registered Park and Garden" to align with the NPPF.	"Make a positive contribution to the setting of the <u>Registered Park and Garden</u> registered historic park at Reading Cemetery;"
256	ER2: Whiteknights Campus, University of Reading	Comment	Acknowledging the listed buildings within the site and the connection of the site to a wider historic landscape, we recommend referring to the historic environment in the policy. We suggest wording for consideration.	<p>"Development will accord with the following criteria:</p> <ul style="list-style-type: none"> • Areas of wildlife significance and current or potential green links will be retained or enhanced, and not detrimentally affected by development, including through light effects; • <u>Proposals will conserve or enhance the historic environment;</u> • The safety of those using the campus will be maintained or enhanced; • There will be no significant detrimental impact on the amenity of neighbouring residential properties; and • The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community."
257 / 258	ER3: Royal Berkshire Hospital	Sound		
298	Definition of Historic Parks and Gardens	Comment	This reference should be tightened to clarify that this refers to historic parks and gardens on the Register maintained by Historic England, rather than other historic parks and gardens not on that register. I have added an explanatory sentence in the suggested wording, in case that is useful.	<u>Registered Historic Parks and Gardens: Parks and gardens of special historic interest, designated by Historic England. The Register celebrates designed landscapes of note and facilitates their appropriate protection."</u>



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Home Builders Federation (HBF)

Sent by email to: planningpolicy@reading.gov.uk

18/12/2024

Dear Sir/ Madam

Reading Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the to the Reading Local Plan Partial Update (LPU). The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

New NPPF and transitional arrangements

New NPPF

2. The latest iteration he National Planning policy Framework was adopted on the 12th of December 2024. The transitional arrangements establish that plans that reach regulation 19 to March12 2025 and meeting at least 80% of their housing needs will be examined under the previous version of the framework. However, where plan housing requirement is less than 80% of their local housing needs, as determined using the new Standard Method, the plan will need to be submitted prior to the 12th of March 2025 for it to be considered under the previous version of the framework. On the basis that the housing requirement in this local plan (825 dwellings per annum) is 80.2% of local housing needs then the plan will be considered under the previous NPPF.
3. However, this is based on the assumption that the plan period for the LPU commences in 2023/24. Given that the plan has been prepared on the basis of the standard method with

a base period starting in 2024/25, HBF considers the period over which housing should be planned for should start from 24/25 not 23/24. Given that the Council's housing requirement is capacity constrained this would mean that the annual housing requirement in the plan would fall on the basis of a policy compliant plan period being adopted. Using the latest housing trajectory in the LPU starting the plan in 24/25 would result in a housing requirement of 813 dpa, 79% of local housing needs.

4. It is also notable that the windfall allowance has not been amended to reflect the Council's evidence. The trajectory in Appendix 1 includes a total figure of 2,859 homes from small unidentified sites of less than 10 units yet the Housing and Economic Land Availability Assessment from November 2024 recommends that these sites would deliver 1,534 homes over the plan period. Reducing capacity to reflect the council's evidence would see the housing requirement fall to 751 dpa over the plan period (73% of local housing needs).
5. However, given that the housing requirement in the LPU is a capacity constrained figure, and it is the Council's position that it cannot meet its full housing needs using either the current or proposed standard method, the HBF consider the most appropriate way forward is for the Council to submit under the new NPPF. This would ensure that there is no confusion as to the level of unmet housing needs arising in Reading and avoid the need for the plan to be reviewed in line with paragraph 236 of the new NPPF.

Viability evidence

6. The Council did not publish its viability evidence until the two week prior to the consultation closing and did not extend the consultation period as suggested by the HBF. This gave us insufficient time to properly consider the evidence and as such the HBF reserve the right to comment on the viability evidence through the examination in public.

Duty to Co-operate

7. The Council outline in their Duty to Co-operate Statement that no statements of common ground (SoCG) have been signed but there is an intention to prepare one for each of the three neighbouring planning authorities. It is disappointing that these have not been prepared for this consultation and does not point to a particularly active or ongoing approach to co-operation. SoCGs should not just be one off documents that are prepared prior to submission of the local plan but on-going statements of co-operation that are regularly

updated to indicate progress, or lack of it, with regard to strategic cross boundary issues. These will need to be agreed and signed off prior to submission and HBF reserves the right to comment on these through the examination in public.

8. From the evidence presented it would appear that the Council has engaged with its neighbours on the strategic issue of housing need. However, HBF disagree with the premise of this co-operation that there are unmet needs and there are the exceptional circumstances present to justify the use of alternative method, a point we return to below. Clearly the approach taken by the council has limited the scope of any co-operation and despite the Council writing to neighbouring authorities in August 2024 asking for comments should they choose to use the standard method we are concerned that the engagement has not been effective on this issue.

CC2 Sustainable design and construction

The Policy is unsound as it is not consistent with national policy.

9. This policy will require new housing to achieve net zero. This is defined as a scenario where the quantity of anthropogenic greenhouse gas emissions arising from energy use on an annual basis is zero or negative. The HBF recognise that the Planning and Energy Act 2008 allows Council's to set standards that exceed the energy requirements of building regulations. However, the Written Ministerial Statement from December 2023 requires such policies to be framed on the basis of Building Regulations and use the Target Emission Rate and this need to be reflected in CC2 to ensure consistency with national policy, HBF would recommend that the policy amended to read:

“... to achieve net-zero development as assessed using the Target Emission Rate as specified in the Standard Assessment Procedure. ~~defined as “a scenario in which the quantity of anthropogenic greenhouse gas emissions arising from the development’s operational energy use on an annual basis is zero or negative, and where whole-life emissions are reduced through sustainable design measures.”~~

EN12: Biodiversity

The policy is unsound as not consistent national policy

10. Clause b sets out the statutory requirement to deliver a 10% Biodiversity Net Gain and that this should be applied on the basis of the Biodiversity Hierarchy that is set out in PPG. HBF would therefore question whether the policy is necessary given that is simply reiterating the statutory requirement for BNG. If the policy is to be included, we would suggest the penultimate sentence should be deleted as it is not relevant to the decision maker where offsite provision is delivered. Paragraph 74-008 of PPG is clear that the biodiversity hierarchy includes enhancement of existing habitats on site, creation of new habitats on site, allocation of registered offsite gains and final purchase of credits. The proximity of gains to the site is not necessary for consideration of whether a development has implemented the hierarchy. As the council will be aware the spatial multiplier within the metric already imposes unit penalties the farther the purchased units are from the original development site. As such if development is already incentivised to deliver offsite BNG as close to the development as possible making this sentence an unnecessary additional step.

H1: Provision of Housing

The policy unsound as it is unjustified.

11. The Council are proposing to increase the housing requirements to 825 dpa across the period 2023 to 2041. This requirement is a capacity constrained requirement and is 52 homes short of the 878 dpa arrived at using the standard. The HBF recognises that Reading is a highly constrained with the Council's boundary being drawn close to the urban edge. In setting a housing requirement of 825 dpa the Council would appear to be basing its plan on the 878 dpa arrived at using the standard method the Council claims at paragraph 4.4.3 that the actual need in the area is 735 dpa and there are exceptional circumstances for in Reading that justify using the local assessment need rather than the standard method. HBF do not disagree with the Council's premise the baseline housing need is higher than the standard method without the urban uplift. However, the Council's position for using an alternate method would appear to be based principally on the point that it does not agree with the use of the urban uplift was this results in a housing need figure that is too high.
12. Firstly, it is important to acknowledge that the changes being proposed to the standard method would see local housing needs increase to 1,023 dpa – significantly higher than either the current standard method or the Council's own assessment of needs and an indication as to the level of delivery expected in Reading by the Government. It also gives

an indication as to the level of unmet housing needs that will need to be addressed in neighbouring areas.

13. Secondly, the application of the urban uplift is not meant to be directly related to the needs of Reading. It is applied to increase delivery in urban areas in order to ensure that more homes were built on previously developed land¹ and focus more new development where there are existing infrastructure and services. It was therefore about increase delivery in these areas rather than about meeting the specific needs of those urban areas. Therefore, the HBF would argue that just because identified needs are lower there is no justification for using an alternate method in these specific circumstances and would recommend that paragraph 4.4.3 is deleted as it is unjustified.

Housing supply

14. As to whether the Council's requirement reflects supply capacity over the plan period the HBF cannot comment as it does not promote sites. However, Council must ensure that it has left no stone unturned as to potential sites or whether there is capacity on allocated sites to do more than is being proposed.
15. HBF would also have expected further information to be provided on the expectations for each site in order for all parties to properly consider whether the rate of delivery on each site is justified. It is our experience that where site by site trajectories are not provided, they are asked for by inspectors in order to ensure effective scrutiny of the local plan. For more information on what is expected we would refer the Council to the Preliminary Questions published recently by the inspector examining the Bristol Local Plan. Question 62 and Appendix 1 provide some indication of the detail required. Rather than wait to be asked we would suggest that such a trajectory as part of the evidence supporting the submitted local plan.
16. There also appears to be an inconsistency between the windfall allowance included in the housing trajectory and the council's evidence. Delivery on small scale unidentified sites (commonly referred to as windfall) in housing trajectory in Appendix 1 does not reflect the evidence in the HELAA which recommends at paragraph 4.8 that over the plan period this

¹ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/a6f7879a-da58-45b3-a68d-4176779a93fe>

level of supply will deliver around 1,500 homes. It is not clear why a different figure has been used and the trajectory should be updated to reflect the Council's own evidence.

Plan period

17. Turning to the period over which homes are to be delivered, the Council are proposing to amend this to 2023 to 2041. As set out earlier in our representations the HBF do not consider this to be sound. While the Council are setting a capacity constrained figure this is based on an assessment of housing needs with a base period 2024 to 2034. It is the HBFs' position that the period over which housing needs should be considered should start from the year in which needs are assessed. This approach reflects the fact that the standard method is a forward-looking assessment of housing need that takes into account past under or over delivery through the affordability adjustment. H1 should therefore be amended accordingly. As the Council requirement is constrained by supply this will reduce the total number of homes to be delivered and also the annual requirement. Using the housing trajectory in appendix 1 annual delivery using a sound plan period would be 813 dpa and total delivery reducing to 13,818 home – subject to no further sites being added or capacity on other sites being amended.

H3 Affordable housing

New paragraph 3 in the policy is unsound as it is ineffective.

18. The policy is being amended to include a new clause 3 which requires a viability review of schemes where policy compliance with H3 is not possible. HBF recognise that such policies are consistent with national policy but consider it inappropriate for this to be applied to all development that makes a contribution. The principal, as reconsider the Councils SPD is most applicable to phased development where there can be considerable change over time. As such HBF would suggest that this only be applied to phased development in order to avoid unnecessary viability assessments for development to come forward soon after securing planning permission.

H5: Standards for new Housing

Policy is unsound as it is inconsistent with national policy and unjustified.

Clause b.

19. Clause b would require all new build residential development to achieve water neutrality where possible. This should be deleted. HBF would agree that the lower optional technical standard of 110 l/p/d is justified on the basis that Reading is in a area of water stress, but it is not sound to require development to show that is not possible to go below what is the minimum applicable standard.

Clause c.

20. The proposed policy would require all new development to demonstrate net zero operational carbon onsite by ensuring total average energy use intensity standard for all new dwellings of 35kwh/m²/year and average space heating demand of less than 15-20 kwh/m²/year, with no single dwelling exceeding 60 kwh/m²/year. Where this cannot be achieved the Councils will expect any energy use to be offset through payments to local projects that save the equivalent amount of carbon. This would be calculated using an energy performance modelling considered by the council to accurately predict building performance.
21. Whilst the HBF would agree with the Councils that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
22. However, if the Councils chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted exercise by local authorities of powers conferred on them.

23. The judgment made by Justice Lieven was that the claim failed on all three grounds. In coming to these judgements Justice Lieven importantly notes the intention of the Government at the time with respect to section 1(1)c of the Planning and Energy Act 2008, which allowed Local Authorities to set standards above those in building regulations. Paragraph 65 states:

“With respect to the current section 1(1)(c) specifically, the Minister confirmed councils “can go further and faster than building regulations, but within the national framework”. The Minister also addressed the overall intention of clause 1(2) in the following terms:

“The intention was for local authorities, in setting energy efficiency standards, to choose only those standards that have been set out or referred to in regulations made by the Secretary of State, or which are set out or endorsed in national policies or guidance issued by the Secretary of State. That approach was taken with a view to avoiding the fragmentation of building standards, which could lead to different standards applying in different areas of the country. Although supportive of the hon. Gentleman’s Bill, that was not an outcome that we wanted to achieve.””

24. It is therefore clear that the intention of the original legislation was to ensure that energy efficiency standards within local plans were to be set within the scope of building regulation to avoid a multiplicity of standard coming forward. The judgment goes on to note in paragraph 66 that the WMS does not stray from this purpose. Not only is the WMS compliant with legislation but also with the intention of the Planning and Environment Act 2008 which was to ensure that any policies seeking improved standards on those set out in Building Regulations must be set within the framework of those regulations. As such local plan policies which seek to apply an alternative standard would not only be inconsistent with the WMS but also with the intentions of the legislation.
25. Moving to the WMS itself, the housing minister notes that “Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at

examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

26. HBF do not consider the approach set out in H5 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.

27. The approach proposed by the Councils based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. As such the HBF do not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and the section of the policy under the heading "*All New Residential Development*" and paragraph 4.27 and 4.28 should be deleted.

28. While HBF do not consider the policy to be consistent with national policy we are also concerned that the Councils has not considered the impact on viability, or the deliverability of development given that no viability assessment has been included in the evidence base. Without this evidence it is not possible for the council to introduce these as it has no understanding of the impact on development in Reading. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggest the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes

Standard. The costs for similar standards to those being proposed can be found in the FHH report 'Ready for Zero'. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Councils.

29. The various specifications and costs considered are summarised in Figure 8 of Ready for Zero and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. This level of additional cost will have an impact on the viability of development in Reading and will not to be properly assessed by the council.
30. With regard to deliverability of zero carbon homes HBF would not disagree that the proposed standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed by Government in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed.
31. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Councils are proposing that this would "... *create a high risk of quality problems, inflated costs and, potentially, stalled build programmes.*" However, HBF could find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes can be built. The Council will need to speak directly to a range of housebuilders operating in Reading to understand the impact of its policy on the rate at which homes will be delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified
32. While HBF understands the desire for LPAs to go further it must be recognised that current policy outlines that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building

performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 159b of the NPPF stating that “*Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards*”.

33. If the Councils have the evidence to show that the policy is deliverable, they will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area.
34. HBF also note that where net zero cannot be achieved for technical reasons the council will require applicants to provide offsite renewable energy, provide a payment of between £5,000 and £15,000 per dwelling to the council demonstrate a building will be connect to a heat network or demonstrate compliance with Passivhaus plus. With regard to the payment, it is not clear from the local pan or evidence base how the council will use this offset any carbon emissions and how this is directly and fairly related to the scale of the development. Without the necessary evidence it should be deleted.

Conclusion

35. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. I can therefore confirm that the HBF would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to be kept informed of the submission and examination of the local plan.

Yours faithfully

A solid black rectangular box used to redact the signature of Mark Behrendt.

Mark Behrendt MRTPI
Planning Manager – Local Plans

Home Builders Federation

Email: mark.behrendt@hbf.co.uk

Tel: 07867415547

Iwaschkin, Anna

From: ANNA IWASCHKIN [REDACTED]
Sent: 17 December 2024 19:28
To: Planning Policy
Subject: Re- Local Plan Partial Update consultation

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Planning Policy Team, I write to support the submission of Keep Kentwood Green to ensure that the full woodland on Kentwood and Armour Hills is definitively designated as 'Local Green Space' so that any proposals for development on it are denied.

My reasons are several. Firstly, The woodland is and protects the habitat of rich local wildlife: small mammals, trees, wild flowers, insects and invertebrates. The once rare beautiful Jersey Tiger Moth has chosen this site for colonies. The land connects with and is part of a long green corridor from the Thames stretching across parks and green spaces right over to the Kennet. Thus it provides a vast stretch of land for biodiversity.

Equally, the area is part of a substantial green lung for a busy congested urban area.

Also, to take it away would be to deny the local community a sense of peace and tranquility.

Part of Reading's much loved unique local architecture are the characterful Victorian painted brick row cottages, houses and special buildings of which there are a number in the area of Kentwood and Armour Hills. A modern housing development there in among the historic properties would be a very unfavourable, messy, look.

This piece of land has been fought over for many years by the local community and, every time, they have managed to conserve it to their great joy. Please help them to conserve nature and also their local identity.

Thank you.

Anna Iwaschkin. [REDACTED]

Jenks, Katie

From: Katie Jenks [REDACTED]
Sent: 03 December 2024 09:39
To: Planning Policy
Subject: Land on Kentwood and Armour Hills, Tilehurst

Warning!
For the attention of
RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Morning,

I am writing to express my opinion and opposition to land on Kentwood and Armour Hills being used for development.

At the moment, I understand that LGS has been granted to some of the site but not all (at present). As a local resident and also a joint founder of the community group Wild Tilehurst (a BBOWT supported Wilder scheme), I feel that LGS should be granted to all of the land and am aware that it is a proposed Local Wildlife Site - which cannot be confirmed until the owners allow surveys on the land, which is unlikely to happen.

We understand that there is a large main badger sett on the land, outlier setts are in the land adjacent to the Builders yard as well as setts underneath the Builders Yard. They are also likely to have setts underneath the scrub and bramble.

The scrub and bramble in the spaces not yet granted LGS are a vital source of protection and food for many animals including migratory birds which use the bramble to nest (E.g. Common Whitethroat, Chiffchaff, Blackcap). Deer, badger, hedgehog, fox and birds use the scrub as a corridor between other areas and also use it to forage. Many of these animals will be dependent on this land for survival. There is also the potential for dormice to be present, as bramble is one of the main nest-supporting shrubs.

My opinion is that it is vital to protect such a valuable habitat for wildlife and the community of Tilehurst. Granting the whole land LGS is an opportunity to manage it properly and protect and increase its biodiversity.

Katie Jenks

John Lewis Partnership

Representations to the Reading Borough Local Plan Partial Update

Regulation 19 (Pre-Submission) Consultation
(November 2024)

John Lewis Partnership

Contents

Executive Summary	1
1. Introduction to Representations	3
2. Policy H1 (Provision of Housing)	5
3. Policy H2 (Density and Mix)	7
4. Policy H3 (Affordable Housing)	10
5. Policy H4 (Build to Rent Schemes)	11
7. Policy CR6 (Living in Central Reading)	12
8. Policy CR10 (Tall Buildings)	14
9. Policy CR14 (Other Sites for Development in Central Reading)	16
10. Conclusion	24
Appendix 1 – Site Location Plan	25
Appendix 2 – Design and Access Statement	26
Appendix 3 – Planning Statement	27
Appendix 4 – HTVIA	28
Appendix 5 – Archaeological DBA	29
Appendix 6 – Noise Assessment	30
Appendix 7 – Air Quality Assessment	31
Appendix 8 – Phase I and II Geo-Environmental Site Assessment	32

Executive Summary

- i. These representations have been prepared on behalf of John Lewis Partnership (JLP) in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough Local Plan Partial Update (LPPU).
- ii. JLP own land at Mill Lane, Reading ('the Site') which is allocated for residential development under draft LPPU Policy CR14r (John Lewis Depot, Mill Lane). The Site has previously been promoted for residential development, on behalf of JLP, in response to the Call for Sites (June 2023) and LPPU Regulation 18 consultation (January 2024).
- iii. A full planning application (ref. PL/24/1155) at the Site was submitted to Reading Borough Council (RBC) in August 2024, and is currently being determined, for:

"Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking."

- iv. Our response to the current Regulation 19 Pre-Submission consultation is based on details contained within previous representations and the current planning application and seeks to assist in informing the final stages of the LPPU.
- v. It is welcomed that the former John Lewis Depot at Mill Lane is allocated for residential development under Policy CR14r of the draft LPPU. The Site is no longer in use and comprises brownfield land in a sustainable location within the designated Reading Central Area and within close proximity of key local services and facilities within the town centre. The redevelopment and intensification of brownfield land in sustainable locations is explicitly encouraged in both national and local planning policy, including the National Planning Policy Framework (NPPF) (2023) (which the LPPU is being examined under) and the current Reading Local Plan (2019).
- vi. Furthermore, whilst the draft LPPU is intended to be examined under the NPPF (2023), based on transitional arrangements, it is notable that the new NPPF (December 2024) and accompanying new standard method include a further strengthening of Government support for overall housing delivery and the development of brownfield land. This includes a further emphasis on the use of the standard method, reinstatement of the requirement to demonstrate a 5-year housing land supply including 5% buffer, and further emphasis on the need to densify development on brownfield land. Indeed the Government's objectives and focus for the planning system moving forwards are clear that the Councils must plan positively to accommodate a significant increase in housing.

- vii. The current planning application further demonstrates that the Site can deliver high-quality build-to-rent residential development and provide a number of clear and substantial benefits, as illustrated further within the accompanying submitted Design and Access Statement (Appendix 2) and Planning Statement (Appendix 3).
- viii. Notwithstanding this, a number of changes are recommended to draft LPPU Policy CR14r and other draft LPPU policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2024).

1. Introduction to Representations

1.1. Introduction

- 1.1.1. These representations have been prepared on behalf of John Lewis Partnership (JLP) in response to the current Regulation 19 Pre-Submission consultation for the Reading Borough Local Plan Partial Update (LPPU). This Statement sets out JLP's response to the consultation focused on relevant draft policies and the supporting evidence base.

1.2. Context

- 1.2.1. JLP own land at Mill Lane, Reading ('the Site') which is allocated for residential development under draft LPPU Policy CR14r (John Lewis Depot, Mill Lane).
- 1.2.2. The Site has previously been promoted for residential development, on behalf of JLP, in response to the Call for Sites (June 2023) and LPPU Regulation 18 consultation (January 2024).
- 1.2.3. A full planning application (ref. PL/24/1155) at the Site was submitted to Reading Borough Council (RBC) in August 2024, and is currently being determined, for:

"Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking."

- 1.2.4. Our response to the current Regulation 19 Pre-Submission consultation is based on details contained within previous representations and the current planning application and seeks to assist in informing the final stages of the LPPU.

1.3. Report Structure

- 1.3.1. This report is structured as follows based on relevant draft policies contained within the Regulation 19 Pre-Submission consultation document (November 2024) and the supporting evidence base.
- 1.3.2. Responses are set out under each relevant draft policy with proposed changes set out as necessary to ensure the soundness of the Plan based on paragraph 35 of the National Planning Policy Framework (NPPF) (2023). However it is noted that paragraph 35 of the NPPF (2023) is unchanged in the new NPPF (December 2024) (now paragraph 36).
- Policy H1: Provision of Housing;
 - Policy H2: Density and Mix;
 - Policy H3: Affordable Housing;
 - Policy H4: Build to Rent Schemes;

Representations to the Reading Borough Local Plan Partial Update

Regulation 19 Consultation



- Policy CR6: Living in Central Reading;
- Policy CR10: Tall Buildings;
- Policy CR14: Other Sites for Development in Central Reading.

2. Policy H1 (Provision of Housing)

2.1. Introduction

- 2.1.1. Policy H1 states that provision will be made for at least 14,850 new homes (825 homes per annum) during the Plan period 2023 to 2041. The supporting text to Policy H1 explains that the proposed housing requirement has been identified having regard to two different assessments of future housing need – 878 homes per year based on the standard methodology (including 35% urban uplift) or 735 homes per year based on a local Housing Needs Assessment (HNA) (2024).

2.2. Response

- 2.2.1. The NPPF (2023) is clear that the purpose of the planning system is to contribute towards the achievement of sustainable development (paragraph 7), including through the provision of a sufficient number and range of new homes (paragraph 8). Paragraph 60 outlines the Government's objective to significantly boost the supply of homes.
- 2.2.2. To achieve this objective, Paragraph 61 of the NPPF (2023) is clear that, *'To determine the **minimum** number of homes needed, strategic policies should be informed by a local housing need assessment, **conducted using the standard method** in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area'* [our emphasis].
- 2.2.3. Paragraph 61 of the NPPF (2023) adds that, *'There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need...'*
- 2.2.4. The supporting text to Policy H1 and the LPPU evidence seek to explain that there are exceptional circumstances (relating to demographic issues and the required urban uplift) which justify using the Housing Needs Assessment (HNA) (2024) as an alternative approach to the use of the standard method.
- 2.2.5. The Housing Provision Background Paper (November 2024) (para 3.6) explains that the current standard method is 'flawed' with regards to demographic issues as it is based on 2014-based household projections. The Council consider that this is a 'sufficiently strong argument on its own' for an alternative approach (para 3.7). Notably however, the Background Paper (November 2024) (para 3.5) adds that the 2014-based household projections are a 'particularly significant underestimate for Reading' and the HNA (2024) (para 5) states that the Standard Method (if the urban uplift is excluded) is therefore an 'under-estimate' of local housing need on this basis.

- 2.2.6. The draft LPPU and Housing Provision Background Paper (November 2024) argue that the urban uplift is 'inappropriate' to apply in Reading based on its geographical area and existing population. Whilst it is acknowledged that the urban uplift does not take into account specific local needs and characteristics, the NPPF (2023) (paragraph 62 / footnote 27) and Planning Practice Guidance (PPG) are clear that the overall purpose of the urban uplift is rather to prioritise the use of brownfield sites within urban centres and to promote the most efficient use of land (PPG Paragraph: 035 Reference ID: 2a-035-20201216). The size and population of Reading are therefore not considered to be reasons for not applying the urban uplift and the efficient use of brownfield land; and to do so would undermine the Government's emphasis (through applying the urban uplift) of making efficient use of brownfield land.
- 2.2.7. Given the draft LPPU (para 4.4.1) acknowledges the 'pressing need' for 'strong delivery of new housing' and seeks to meet objectives to 'strengthen the role of Reading' and 'ensure that as many new homes as possible are delivered' (Objectives 2 and 3), it is considered that the Council should aim to deliver a housing requirement that matches or exceeds the requirement provided by the standard method. To deliver less than the standard methodology of 878 homes per annum, as proposed by Policy H1, conflicts with these objectives.
- 2.2.8. Furthermore, it is notable that the new NPPF (December 2024) and accompanying new standard method include a further strengthening of Government support for overall housing delivery and the development of brownfield land. This includes a further emphasis on the use of the standard method, reinstatement of the requirement to demonstrate a 5-year housing land supply including 5% buffer, and further emphasis on the need to densify development on brownfield land. The proposed standard method would also further increase local housing needs in Reading to 1,028 homes per annum. Whilst the draft LPPU is intended to be examined under the current NPPF (2023), based on the transitional arrangements which were set out in the draft NPPF (July 2024), the Government's objectives and focus for the planning system moving forwards are clear: that the Council must plan positively to accommodate a significant increase in housing.

2.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness.

Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.

3. Policy H2 (Density and Mix)

3.1. Introduction

- 3.1.1. Draft Policy H2 requires residential developments to meet minimum density targets based on location, including: 260 dwellings per hectare (dph) for town centre sites, 100dph for urban sites and 42dph for suburban sites, subject to exceptions. The policy also requires that developments of 10 or more dwellings in district/local centres, outside the central area, provide a housing mix that includes at least 20% three-bedroom or larger homes.

3.2. Response

Density

- 3.2.1. The increase in minimum density targets for town centre sites – from an indicative target of ‘above 100’ dph in the adopted Local Plan (2019) to a minimum density of 260dph in the draft LPPU – is welcomed and aligns with the overall aims of the NPPF (2023).
- 3.2.2. It is noted however that draft Policy H2 allows for a number of exceptions to meeting the minimum density targets, including where development would ‘cause unacceptable harm’ to heritage assets or amenity or ‘prevent’ the minimum proportion of 3-bedroom homes being achieved.
- 3.2.3. The NPPF (2023) (paragraphs 123, 129 and 135) states that planning policies should ‘*promote an effective use of land in meeting the need for homes*’ and that development should optimise the use of land to meet identified housing needs, in particular town centres that are well served by public transport. Paragraph 129 and 130 further encourages the use of ‘minimum’ density standards and ‘significant uplifts’, unless ‘*the resulting built form would be wholly out of character with the existing area*’.
- 3.2.4. Whilst the NPPF (2023) is therefore clear that other factors should be taken into consideration, the overall aims are to optimise the use of land and to support increased housing delivery including through the use of brownfield land. This has been further strengthened in the new NPPF (2024). This is also reflected in the draft LPPU objectives, which include objective 2 to, ‘*Make the most efficient use of Reading’s limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs...*’.
- 3.2.5. The exceptions detailed in the policy therefore have the potential to conflict with the wider stated objectives of the Plan as well as the overall aims of national policy. Further, many of the matters covered by the exceptions are dealt with under other policies in the LPPU (e.g. relating to housing mix, heritage, open space requirements etc) and should be considered as part of the overall planning balance in the consideration of planning applications.
- 3.2.6. On this basis, and to support meeting the Government’s overall aims and the LPPU objectives, it is recommended that the emphasis of draft Policy H2 should be amended and the exceptions deleted.

- 3.2.7. It is noted that the supporting text to Policy H2 (paragraph 4.4.10) states that *‘Even above the minimum density, there is still significant scope for a range of densities. In the town centre in particular, the circumstances of the site may allow for a density that significantly exceeds the minimum specified.’*
- 3.2.8. This flexibility is welcomed and aligns with our view that the appropriate density should take into account site-specific circumstances and the opportunities and benefits of development, based on the minimum density targets. Each site will have unique characteristics, such as its location and accessibility to public transport, which will influence the appropriate density. It is important therefore that the minimum density requirements are applied as a guide with the precise density determined through detailed design and technical assessment. The acknowledgement for development to ‘significantly exceed’ these requirements should also be included in the policy wording itself.

Mix

- 3.2.9. Part 2 of draft Policy H2 includes an overall requirement for residential development to *‘maximise the provision of family homes of three or more bedrooms’*, with specific mix requirements set out for developments outside the central area. It is noted that the overall requirement for 3-bed units is derived from the Reading Housing Needs Assessment (HNA) (2024) which provides a housing needs assessment across the Plan period.
- 3.2.10. Whilst it is acknowledged that the HNA (2024) (Figure 6) highlights an overall need for 3-bed units, the borough's overall housing needs are diverse and there are a number of more detailed factors arising from the HNA which should also be taken into account.
- 3.2.11. Notably, the HNA (2024) (Figure 6) shows that the overall mix of affordable housing needed is focused more towards smaller 1-bed units. In addition, the HNA (2024) (Figure 29) projects significant increases in smaller households, including both ‘single person households’ and ‘couples without dependent children’, which are each projected to increase by over 4,000 during the Plan period and to become the largest household groups in the borough. The HNA (2024) (Figure 51) states that the majority (62%) of dwellings occupied by households aged 75+ are 3-bedrooms or more. It is clear therefore that housing needs in the borough are more nuanced and are likely to change during the Plan period and across the borough, based on demographic changes and household formation for instance.
- 3.2.12. It is notable that draft Policy H2 states ‘where possible’ and it is important that specific mix requirements are not strictly applied. The LPPU should be sufficiently flexible to take into account changing needs, site-specific circumstances and viability considerations, particularly in light of the borough’s overall increasing housing needs.
- 3.2.13. The LPPU should also recognise all forms of housing provision which can contribute to ‘family’ needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).

3.2.14. Accordingly it is recommended that reference to specific mix requirements is deleted from Policy H2.

3.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H2 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H2 in order to ensure the soundness of the Plan.

"1. Density

Residential development will be expected to achieve at least the following minimum densities:

- *Town centre sites: 260 dwellings per hectare*
- *Urban sites: 100 dwellings per hectare*
- *Suburban sites: 42 dwellings per hectare.*

Exceptions to the minimum densities will apply where achieving that density would:

- ~~*Cause unacceptable harm to a designated heritage asset or its setting;*~~
- ~~*Cause a detrimental effect on important landscapes;*~~
- ~~*Create unacceptable impacts on amenity of existing or new residents;*~~
- ~~*Prevent an appropriate conversion of an existing building or buildings;*~~
- ~~*Prevent policy requirements on the minimum proportion of family homes of three or more bedrooms from being achieved; or*~~
- ~~*Prevent policy requirements on the provision of open space or other necessary on-site facilities from being achieved.*~~

~~*Subject to the above, +*~~ *The appropriate density of residential development will be informed by:*

- *the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;*
- *its current and future level of accessibility by walking, cycling and public transport;*
- *the need to achieve high quality design;*
- *the need to maximise the efficiency of land use; and*
- *the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.*

The circumstances of the site may allow for a density that significantly exceeds the minimum specified.

2. Mix of sizes

*Wherever possible, residential development should contribute towards meeting the needs for ~~the~~ a mix of housing **based on an up-to-date assessment of local needs and site-specific circumstances** set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms..."*

4. Policy H3 (Affordable Housing)

4.1. Introduction

- 4.1.1. Draft Policy H3 requires developments of 10 or more dwellings to provide 30% affordable housing with provision made on site in the first instance. The proposed updates included within the policy include a specific tenure mix (at least 62% Reading Affordable Rent and up to 38% affordable home ownership products) and requirements relating to 'later viability review'.

4.2. Response

- 4.2.1. The proposed addition of reference to a deferred contribution mechanism, based on a later viability review (part 3 of draft Policy H3), is acknowledged and reflects provisions set out in the adopted Affordable Housing SPD (2021).
- 4.2.2. As explained in the Financial Viability Assessment accompanying the current planning application (PL/24/1155) – it is proposed that the current proposed development at the Site will also be subject to a review mechanism, secured via the Section 106 agreement, to enable the Council to secure additional affordable housing and/or APR at a greater discount to market rent, should the proposed development economics increase when compared to the application stage viability scheme, whilst allowing JLP to take a full developer return.
- 4.2.3. The tenure requirements set out at part 4 of draft Policy H3 are based on details set out within the Affordable Housing SPD (2021). However, given that affordable housing needs are likely to change across the borough over the course of the Plan period, it will be important that affordable housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. Accordingly, it is recommended that a specific tenure mix is removed from Policy H3 to allow greater flexibility and support affordable housing needs in the future.

4.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H3 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H3 in order to ensure the soundness of the Plan.

*“...In determining residential applications the site size, suitability, ~~and-type~~ **and tenure** of units to be delivered in relation to the current evidence of identified needs will be assessed. ~~The following tenure mix will be sought:~~*

- ~~• At least 62% of the affordable housing to be provided as Reading Affordable Rent;~~*
- ~~• A maximum of 38% of the affordable housing to be provided as affordable home ownership products, which may include First Homes and shared ownership....”~~*

5. Policy H4 (Build to Rent Schemes)

5.1. Introduction

- 5.1.1. Draft Policy H4 sets out requirements for Build to Rent schemes in Reading. The proposed updates included in draft Policy H4 include a requirement for a further three-year tenancy period to be offered at the end of a minimum three-year tenancy.

5.2. Response

- 5.2.1. The proposed requirement for a further three-year tenancy to be offered is acknowledged and supported.
- 5.2.2. As explained in the current planning application submission (ref. PL/24/1155), JLP proposes to develop professionally managed rental housing for the long term and to deliver high-quality homes rented directly from a trusted brand, providing residents with greater certainty of tenure. JLP is proposing to invest for the long term, solidifying its future commitment to Reading and providing great experience in home rental for local people.

7. Policy CR6 (Living in Central Reading)

7.1. Introduction

- 7.1.1. Draft Policy CR6 sets out criteria relating to the design of new development in Central Reading. The proposed updates included in draft Policy CR6 include a increased minimum 15% requirement for 3-bed units as part of new residential developments.

7.2. Response

- 7.2.1. It is noted that the increased requirement for 3-bed units is derived from the Reading Housing Needs Assessment (HNA) (2024) which provides a housing needs assessment across the Plan period.
- 7.2.2. As explained in response to draft Policy H2 above, whilst it is acknowledged that the HNA (2024) (Figure 6) highlights an overall need for 3-bed units, the borough's overall housing needs are diverse and there are a number of more detailed factors arising from the HNA which should also be taken into account.
- 7.2.3. Notably, the HNA (2024) (Figure 6) shows that the overall mix of affordable housing needed is focused more towards smaller 1-bed units. In addition, the HNA (2024) (Figure 29) projects significant increases in smaller households, including both 'single person households' and 'couples without dependent children', which are each projected to increase by over 4,000 during the Plan period and to become the largest household groups in the borough. The HNA (2024) (Figure 51) states that the majority (62%) of dwellings occupied by households aged 75+ are 3-bedrooms or more. It is clear therefore that housing needs in the borough are more nuanced and are likely to change during the Plan period and across the borough, based on demographic changes and household formation for instance.
- 7.2.4. It is noted that the mix requirements set out in Policy CR6 are provided 'as a guide' and it is important that specific mix requirements are not strictly applied for all sites in Central Reading. The LPPU should be sufficiently flexible to take into account changing needs, site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs and the focus of development on town centre sites. Indeed this is particularly relevant for town centre brownfield sites where numerous factors may influence proposals and where the NPPF (December 2023) encourages significant uplifts in density.
- 7.2.5. The LPPU should also recognise all forms of housing provision which can contribute to 'family' needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).
- 7.2.6. Accordingly it is recommended that reference to specific mix requirements is deleted from Policy CR6.

7.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy CR6 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR6 in order to ensure the soundness of the Plan.

*“...All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided **based on an up-to-date assessment of local needs and site-specific circumstances**. ~~As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable....~~”*

8. Policy CR10 (Tall Buildings)

8.1. Introduction

- 8.1.1. Draft Policy CR10 defines 'tall buildings' as being of 12 storeys of residential (equating to 36 metres tall) and 10 storeys of commercial floorspace or above. The policy identifies three areas where there is a positive presumption that tall buildings will be acceptable (the Station Area Cluster, the Western Grouping and the Eastern Grouping), as well as identifying 'areas of less suitability' where there is a presumption against tall buildings unless a clear case can be made that such development would not undermine the clusters when all significant views are taken into account.

8.2. Response

- 8.2.1. Draft Policy CR10 as drafted is restrictive in its approach towards tall buildings in general, which is at odds with the overall objectives of the LPPU and with national policy seeking to make efficient use of land, redevelop brownfield sites as a priority and increase densities in order to increase housing delivery. Indeed the new NPPF (2024) further emphasises the need to densify development on brownfield land.
- 8.2.2. More specifically, the Policy has the potential to conflict with the minimum target densities set out in Policy H2 (which promotes densities of at least 260 dph in the town centre – an area which extends significantly beyond the tall buildings clusters and 'areas of less suitability' identified in Policy CR10). The approach of Policy CR10 needs to be more flexible to allow tall buildings in highly sustainable locations such as the town centre, where the LPPU already acknowledges that very high density development will be appropriate. In this way, Policy CR10 can be amended to be more consistent with Policy H2 so that the two policies work together to achieve the LPPU's vision and objectives.

8.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy CR10 as currently drafted does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR10 in order to ensure the soundness of the Plan.

'In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above. Tall buildings will meet all the requirements below.

i) Within Reading Borough, tall buildings will ~~only~~ be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map, ~~other than as set out in criterion v).~~ These areas are as follows:

CR10a: Station Area Cluster

CR10b: Western Grouping

CR10c: Eastern Grouping...

v) **Outside of these identified clusters, but elsewhere within the defined town centre, ~~In addition to the three clusters, 'areas of less suitability for tall buildings' are shown on the Proposals Map, within which tall buildings will not~~ may be suitable unless where it can be demonstrated a clear case can be made that the cluster approach would not be undermined when all significant views are taken into account and that all of the other aspects of this policy are complied with.**

~~vi) Outside the three clusters and the 'areas of less suitability for tall buildings', tall buildings will not be permitted....'~~

9. Policy CR14 (Other Sites for Development in Central Reading)

9.1. Introduction

- 9.1.1. Policy CR14 identifies sites for development in Central Reading, including updates to the allocation at The Oracle (CR14g) and a new allocation at the former John Lewis Depot, Mill Lane (CR14r).
- 9.1.2. Policy CR14g has been amended to delete reference to 'use of site at Letcombe Street for public car park' [i.e. the John Lewis Depot site] as part of the allocation at The Oracle.
- 9.1.3. Policy CR14r sets out requirements and principles for development at the John Lewis Depot site as follows:

'CR14r JOHN LEWIS DEPOT, MILL LANE

Development for residential

Development should:

- *Avoid detrimental effects on the setting of listed buildings and the Conservation Area;*
- *Take account of potential archaeological significance;*
- *Address noise impacts on residential use;*
- *Address air quality impacts on residential use; and*
- *Address any contamination on site.*

Site size: 0.37 ha

76-110 dwellings'

9.2. Response

Policy CR14g

- 9.2.1. The proposed removal of reference to the John Lewis Depot site as part of The Oracle allocation (Policy CR14g) is supported.
- 9.2.2. Policy CR14g of the current adopted Reading Local Plan (2019) allocates the John Lewis Depot site, together with land opposite across the A329, for public car parking to support an additional 1,600-2,000sqm of retail or town centre uses at The Oracle Shopping Centre. However, as set out in our previous LPPU representations, in light of recent major changes in the retail sector and reduced demand for additional retail floorspace (and additional car parking) the allocation has not been delivered as the Council previously envisaged.

- 9.2.3. Hammerson (owners of The Oracle) have confirmed to JLP that they do not have any intentions to implement the existing allocation for additional retail provision and that they do not therefore require the use of the Site for car parking. Indeed, Hammerson submitted planning applications (refs. 221916 and 221917) for proposed residential development at The Oracle (including part of the adopted Local Plan allocation) in December 2022 and confirmed that *'there is not considered to be the need to provide additional retail floorspace at The Oracle as per the allocation under Policy CR14(g)'* (Planning Statement, paragraph 7.29).
- 9.2.4. Furthermore, the Sustainability Appraisal (SA) (November 2024) (page 170-172), accompanying the draft LPPU, considers the option to *'Retain as part of existing allocation (CR14g)'* as part of considering the allocation of the John Lewis Depot site for residential development. Notably however, the SA concludes that this option *'could result in a negative effect in respect of housing delivery'* and *'could risk residential development coming forward elsewhere, i.e., on land that is not previously developed.'* The SA therefore does not identify this as the preferred option for the site.
- 9.2.5. Accordingly, for the reasons set out above, and based on the LPPU evidence base, the proposed removal of reference to the John Lewis Depot site from the existing CR14g allocation is supported.

Policy CR14r

- 9.2.6. The overall identification of the John Lewis Depot site at Mill Lane (Cen3) as a proposed site allocation for residential development is supported.
- 9.2.7. The Site is in a sustainable location on the edge of the town centre in Central Reading (as defined in the adopted Local Plan (2019)), within close proximity of key local services and facilities within the town centre including The Oracle shopping centre opposite and Reading railway station located approximately 1km to the north. The use of the existing building as a customer collection centre became surplus in 2021, after the function transferred to the John Lewis store on Broad Street, Reading. The Site is therefore suitable and available for redevelopment.
- 9.2.8. An opportunity thereby exists to deliver high quality, purpose-built homes to support increasing demand in a sustainable location. This aligns with the aims of current and emerging national policy, including the NPPF (2023) and new NPPF (2024), which explicitly encourage the redevelopment and intensification of brownfield land to increase housing supply.
- 9.2.9. As referred to above, a full planning application (ref. PL/24/1155) for the proposed redevelopment of the Site was submitted in August 2024, comprising the demolition of the existing building and erection of new build to rent dwellings, together with flexible commercial / community space, residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.
- 9.2.10. The submitted application explains that there are clear benefits of the development proposals including:
- Redevelopment of an underdeveloped sustainable town centre site providing much-needed housing in Reading;

- 215 thoughtfully designed, high quality, community integrated new rental homes for Reading;
- Homes owned and managed by the John Lewis Partnership, with the care and quality synonymous with JLP, ensuring a high standard of living for residents;
- All homes will be fitted out with high quality John Lewis furniture;
- A mix of homes, including a high proportion of family homes;
- Provision of a range of residents' facilities including shared spaces for working, exercising or socialising;
- Tenure-blind affordable homes for local people, including key workers, pepper-potted throughout the development, built and fitted out to the same standards as the market rent homes and enjoying access to the same facilities, amenities and services;
- Longer tenancies promoting a sustainable long-term community, enabling residents to put down roots;
- 24/7 on-site management team, looking after residents and curating communities;
- Provision of a flexible commercial / community space to support local businesses and groups;
- Creation of a low carbon development with a target 4-star Home Quality Mark rating;
- Improved links around the Site to enhance accessibility and safety for pedestrians and cyclists;
- Supporting sustainable travel opportunities including through provision of cycle parking facilities and Car Club provision;
- New public and private landscaped spaces with increased tree planting, accessible play areas and public realm improvements;
- Delivery of significant Biodiversity Net Gain in excess of 10% requirement, ensuring the introduction of ecological diversity and wildlife habitats;
- Support and assistance for the local community, groups and organisations in the form of a long term Social Value programme;
- Creation of up to 130 gross direct construction jobs per annum, with training and apprenticeship opportunities;
- Up to £2m of new household spend generated per year, supporting local goods and services in the borough;
- Public sector revenues through additional Council Tax revenue, Business Rates, New Homes Bonus and Community Infrastructure Levy.

9.2.11. The application is currently being determined by RBC and JLP is committed to continuing to work closely with the Council through determination and the preparation of the Local Plan in order to deliver development at the site.

9.2.12. Notwithstanding the above, below we set out comments in relation to the detailed requirements of Policy CR14r in order to ensure the soundness of the Plan.

'Development for residential'

9.2.13. As referred to above, the allocation of the Site for residential development is supported.

9.2.14. In addition, owing to its sustainable location and further to pre-application discussions prior to the current planning application submission (including positive engagement with local community groups and organisations), the Site also provides an opportunity to accommodate a flexible community / commercial space to support local needs. The current planning application thereby proposes a flexible community / commercial space (Use Class E/F1/F2) on the ground floor at the eastern end of the development.

9.2.15. It is therefore recommended that the allocation is amended to reference provision for flexible community / commercial use in addition to residential use.

Site area

9.2.16. Draft Policy CR14r refers to the site area as 0.37 ha, reflecting the response submitted to the Call for Sites in 2023. However the current planning application (ref. PL/24/1155) includes additional land to deliver landscaping enhancements. It is therefore requested that the allocation boundary is amended to align with this for consistency and for clarity in applying Policy CR14r. A copy of the submitted Site Location Plan is enclosed at Appendix 1.

Quantum of development

9.2.17. Draft Policy CR14r identifies the site for residential development of '76-110 dwellings'. It is however unclear how this exact range has been calculated and notably there are different references within the supporting evidence base, e.g. the SA (November 2024) assesses a potential site capacity of '75-125 dwellings' which is identified as the 'preferred option' for the CR14r site allocation.

9.2.18. It is noted that draft Policy H2 sets out a 'minimum' density of 260 dwellings per hectare for town centre sites, which would equate to a minimum capacity of 96 dwellings at the Site (based on a site area of 0.37ha). It is therefore not clear or consistent with how the lowest end of the range (76 dwellings) has been derived in the draft policy. The minimum capacity would further increase to 114 dwellings based on the site area of 0.44ha, exceeding the entire range identified in the draft LPPU. The supporting text to Policy CR14 is also clear that the dwelling figures are 'indicative...based on an initial assessment' and are 'intended as a guide'. Draft LPPU paragraph 5.4.33 adds that, *'the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout.'*

9.2.19. In this regard it is important that the current live planning application at the Site (which has been informed by detailed design and technical assessment work), as well as the supporting LPPU evidence base, is also taken into account in seeking to define an indicative quantum of development within Policy CR14r.

9.2.20. Notably, the SA (November 2024) assesses two options for the site capacity, including:

- Option No. CR14r(i): *'Redevelop warehouse for 200 build to rent dwellings'*; and
- Option No. CR14r (iv): *'Residential development at more general town centre or edge of centre densities (75-125 dwellings)'*

- 9.2.21. The assessment of both options in the SA (November 2024) is identical aside from a statement that, *'It could be considered that a development that comprises a more general 'town centre' or 'edge of centre' type density would be more appropriate to the surrounding townscape compared with the proposed dwelling numbers under option CR14r(i)'*. It is clear however from the reference to 'could be considered' that this assessment has not been informed by any detailed assessment of townscape impacts.
- 9.2.22. The detailed design and technical assessment work accompanying the current planning application submission (ref. PL/24/1155) demonstrates that a development of 215 homes is suitable and achievable at the Site. The submitted Design and Access Statement (Appendix 2) explains that the quantum and scale of development has been established based on detailed analysis of the existing context and key local viewpoints and detailed pre-application engagement. Further, the Planning Statement (Appendix 3) concludes that, based on the sustainable and accessible location of the site and the need to optimise the use of land to meet identified housing needs, the overall scale and density of the proposed development meets the provisions of the NPPF (2023) and adopted Local Plan Policy CC6.
- 9.2.23. Accordingly, whilst the quantum of development set out in Policy CR14r is only intended as a guide, it is clear that this should be significantly increased based on the SA (November 2024) and the detailed design and technical assessment which has been undertaken to accompany the current planning application.
- 9.2.24. It is noted that the supporting text to Policy H2 (as referred to above) is also clear that *'Local Plans should set minimum densities for residential development'*, and that, *'Even above the minimum density, there is still significant scope for a range of densities. In the town centre in particular, the circumstances of the site may allow for a density that significantly exceeds the minimum specified'* (paragraphs 4.4.8 to 4.4.10).
- 9.2.25. As referred to above, the approach to setting minimum densities reflects the provisions of the NPPF (2023). The acknowledgement that the density of town centres site may 'significantly exceed' the minimum density is welcomed. Indeed this has been evident in the development at Thames Quarter and Verto (application refs. 162166 and 150019), for example, where the development density has exceeded 500 dwellings per hectare on both sites. It is however, important that clarification is included to this effect in Policy CR14 itself, along with clarification that the ranges are indicative and intended as a guide.

Development requirements

- 9.2.26. Policy CR14r sets out a list of criteria for development at the Site to address relating to heritage, archaeology, noise, air quality and contamination.
- 9.2.27. Notably Paragraph 16 of the NPPF (2023) states that Plans should avoid 'unnecessary duplication' of policies. It is therefore questioned whether these criteria are necessary as part of CR14r given that matters relating to heritage, archaeology, noise, air quality and contamination are covered by other LPPU policies (e.g.CC8, EN1-EN6, EN15 and CR6).
- 9.2.28. Notwithstanding this, below we set out comments in relation to each of the relevant criteria listed under CR14r.

'Development should...Avoid detrimental effects on the setting of listed buildings and the Conservation Area'

- 9.2.29. The Site is also located outside, but adjacent to, the Market Place / London Street Conservation Area, which includes a number of Grade II listed buildings to the east, south and south-west. It is acknowledged that development of the Site must therefore take into account the setting of the Conservation Area and nearby listed buildings.
- 9.2.30. The NPPF (2023) requires the impact of proposed development to be assessed based on the scale of harm to designated heritage assets. Accordingly, clarification is recommended regarding the requirement to 'avoid detrimental effects' and how this test relates to 'substantial harm' tests in the NPPF (2023).
- 9.2.31. Notwithstanding this, the current planning application (ref. PL/24/1155) is accompanied by a Heritage, Townscape and Visual Impact Assessment (HTVIA) (Appendix 4) which was undertaken to inform and assess the potential impacts of the proposed development. The HTVIA identifies a low level of less than substantial harm to the setting of the Meeting House (Grade II) but concludes that the public benefits from the proposed development significantly outweigh the harm caused to the designated heritage asset and therefore paragraphs 208-9 of the NPPF (2023) are satisfied.

'Development should...Take account of potential archaeological significance'

- 9.2.32. It is acknowledged that the Site is located in a designated Area of Archaeological Potential as illustrated on the adopted and draft Proposals Map. The requirement for development at the Site to '*take account of potential archaeological significance*' was previously set out under Policy CR14g of the adopted Local Plan (2019).
- 9.2.33. Accordingly, the current planning application (ref. PL/24/1155) is informed and accompanied by an Archaeological Desk-Based Assessment (DBA) (Appendix 5) which was undertaken to identify and assesses the archaeological potential of the Site and the potential impacts of proposed development.
- 9.2.34. The Archaeological DBA explains that the Site and surrounding area have been subject to extensive previous archaeological work where no significant archaeological features were identified. The DBA therefore concludes that the Site is considered to no longer have potential for archaeological heritage assets or deposits of archaeological interest. On this basis, it is clear that the Site is suitable for development in relation to archaeology.

'Development should...Address noise impacts on residential use'

- 9.2.35. The current planning application (ref. PL/24/1155) is informed and accompanied by a Noise Impact Assessment (NIA) (Appendix 6) to consider potential noise impacts on the proposed residential development. The assessment concludes that noise associated with the proposed development can be controlled to appropriate levels, through the incorporation of appropriate noise control measures (such as acoustic enclosures), double glazed window systems and provision of communal amenity spaces. On this basis, it is clear that the Site is suitable for development in relation to noise.

'Development should...Address air quality impacts on residential use'

- 9.2.36. It is acknowledged that the Site is located within an Air Quality Management Zone which covers the entirety of central Reading as illustrated on the adopted and draft Proposals Map.
- 9.2.37. Accordingly, the current planning application (ref. PL/24/1155) is informed and accompanied by an Air Quality Assessment (AQA) (Appendix 7) undertaken to assess the potential air quality impacts associated with the construction and operation of the proposed development.
- 9.2.38. The AQA concludes that the dust impacts during construction will be temporary and short-term in nature and not significant. Similarly the AQA notes that there will be a net decrease in traffic flows as a result of the proposed development and therefore the operational impacts are not significant. On this basis, it is clear that the Site is suitable for development in relation to air quality.

'Development should...Address any contamination on site'

- 9.2.39. The requirement for development at the Site to 'address any contamination on site' was previously set out under Policy CR14g of the adopted Local Plan (2019).
- 9.2.40. The current planning application (ref. PL/24/1155) is informed and accompanied by a Phase 1 and Phase 2 Environmental Site Assessment (Appendix 8) to consider any risks arising from contamination. Overall the Phase I and II Environmental Site Assessment conclude that contamination is manageable and the site is suitable for residential development, subject to actions including further assessment of petroleum hydrocarbon and asbestos contamination after demolition, further gas monitoring and a foundation works risk assessment. On this basis, it is clear that the Site is suitable for development in relation to contamination.

9.3. **Summary**

With reference to paragraph 35 of the NPPF 2023, the following changes are recommended to Policy CR14 in order to ensure the Plan meets the tests of soundness.

CR14: OTHER SITES FOR DEVELOPMENT IN CENTRAL READING

The following sites will be developed according with the principles set out in this policy:...

CR14r JOHN LEWIS DEPOT, MILL LANE

*Development for residential **and flexible community / commercial use***

Development should:

- *Avoid detrimental effects on the setting of listed buildings and the Conservation Area;*
- *Take account of potential archaeological significance;*
- *Address noise impacts on residential use;*
- *Address air quality impacts on residential use; and*
- *Address any contamination on site.*

*Site size: ~~0.37~~ **0.44** ha*

*~~76-110~~ **200-215** dwellings..."*

10. Conclusion

10.1. Summary

- 10.1.1. These representations have been prepared on behalf of JLP in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough LPPU. Comments have been provided based on key policies and supporting text within the draft Regulation 19 draft Local Plan, as well as the supporting evidence base documents, to assist in informing the final stages of the LPPU.
- 10.1.2. JLP own land at Mill Lane, Reading which is allocated for residential development under draft LPPU Policy CR14r (John Lewis Depot, Mill Lane). A full planning application (ref. PL/24/1155) for the proposed redevelopment of the Site was submitted to RBC in August 2024 and is currently being determined.
- 10.1.3. It is welcomed that the John Lewis Depot at Mill Lane is allocated for residential development under Policy CR14r. The Site comprises brownfield land in a sustainable location within the designated Reading Central Area and within close proximity of key local services and facilities within the town centre. The redevelopment and optimisation of brownfield land in sustainable locations is explicitly encouraged in both national and local planning policy, including the National Planning Policy Framework (NPPF) (2023) and current Reading Local Plan (2019). The current planning application (ref. PL/24/1155) demonstrates that the Site can deliver high-quality build-to-rent residential development and provide a number of clear and substantial benefits.
- 10.1.4. Notwithstanding this, a number of changes are recommended to draft LPPU Policy CR14r and other draft LPPU policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023).

Appendix 1 – Site Location Plan

Appendix 2 – Design and Access Statement

Appendix 3 – Planning Statement

Appendix 4 – HTVIA

Appendix 5 – Archaeological DBA

Appendix 6 – Noise Assessment

Appendix 7 – Air Quality Assessment

Appendix 8 – Phase I and II Geo-Environmental Site Assessment

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Jones, Sarah

(Response from webform)

Title: Ms

First name: Sarah

Last name: Jones

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: All

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

The number of homes being requested to be built each year is far too high. The infrastructure, services, NHS and land available cannot support this high density living. There is evidence to support that high density developments increase pollution, overcrowding, strain on public infrastructure and traffic congestion. Without an increase in green outdoor space it can also lower the quality of life of existing and new residents putting further pressure on limited council & NHS resources.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Louise Acreman

Keep Kentwood Green

Rejwerska, Marcelina

From: Deborah Dadd
Sent: 16 December 2024 11:38
To: Planning Policy
Subject: Regulation 19 comment
Attachments: KKG Regulation 19 response.docx

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Please include the attached comments written on behalf of all members of local community group Keep Kentwood Green. The below detailed names have explicitly asked to be co-signatories (as they were with the Regulation 18 consultation back in January).

As then we can also provide the following information and evidence now, or once a Planning Inspector has been appointed:

- TVERC wildlife species list
- TVERC Local Wildlife Site documentation
- Petition wording and signatory list
- Keep Kentwood Green Facebook membership list (public group)

We have stated in the attachment that we would like the opportunity to speak as part of the public examination process

Kind regards and Happy Christmas

Deborah Dadd
&
Julia Waters
Rupert Dadd
Katie Jenks
Iain Gerrard
Jennie Newnham
Dave Newnham
Rosie Newnham
Lewis Newnham
Ella Newnham
Stan Gamester
Sarah Latcham
Tony Latcham
Steve Hicks
Alex Foxon
Claire Foxon
Rosie Lee
Hazel Sims
Robin Rimmington
Trevor Haynes
Alison Haynes
Kevin Alderson
Ros Hatt
Justin Sadler

Carol Jackson
Michelle Potter
Angela Godwin
Peter Cook
Anne Cook
Leona Wills
James Galloway
Maisey Booth
Andy Young
Andrew Kemp
John Hiscock
Gerry Hiscock
Lynette Burrell
Anna Iwaschkin
Ann Othen
Roger Keane
Phil Smith
Cynthia Agyemang

Response from local action group, *Keep Kentwood Green*, on behalf of our 659 Facebook members and other local residents, to the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19).

The Regulation 18 consultation asked for views on the following two questions and some changes have been incorporated in the pre-submission draft.

Question 15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space? (This question relates to policy EN7).

Question 75: What is your view on the suggested changes to sites WR3s and WR3t?

Q 15: We do consider that **all** the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) should qualify as Local Green Space (LGS). As local residents, we assert that the entirety of the land on Kentwood and Armour Hills (WR3s and WR3t on the Local Plan) is of value to us and should be protected as LGS.

Q 75: While we welcome the redesignation of approximately 0.46ha of WR3s as LGS, on the basis of its importance for wildlife, we assert that the same designation should be granted to the entirety of the land (WR3s and WR3t), for the same reason and because the entirety of the land is demonstrably special as green space to the local community.

Our response pertains in particular to the following sections of the Partial Update of RBC's Local Plan:

"It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Given that this area contains badger setts and a base for wildlife that is of particular importance locally, this is considered to be justified. The importance of this area for wildlife is recognised within the information provided by the ecologist for the Charity's development partners. However, the bulk of site WR3s and all of WR3t would remain in the plan."

"It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate."

We believe the reasons given for designating only part of the land as LGS to be unsound, on the following grounds:

- 1) **All** of the land meets the criteria for LGS designation: it is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance because (in particular) of the richness of its wildlife; and it is local in character and is not an extensive tract of land.
- 2) In referring to the information provided by the ecologist for the Charity's development partners, RBC Officers have privileged the interested and therefore selective view of the landlord TPLC and their agents, who want to develop the land, over the views of the majority of local residents, who want all the land to be protected as LGS.

- 3) LGS is defined by Government as “a way to provide special protection against development for green areas of particular importance to local communities” hence one of the criteria for designation is where those spaces are “demonstrably special to the local community”. The *Keep Kentwood Green* Facebook group has over 650 members; a petition against the sale and development of the land gained over 1000 signatures in a month; a public meeting called at short notice to discuss the future of the land was attended by over 120 local residents, all keen to protect the land from development; over 70 responses were received by RBC from members of the public to the Regulation 18 consultation in support of the LGS status compared to the 1 member of public against. The importance of this land to the local community as Local Green Space is overwhelmingly proven.
- 4) In addition to local residents’ direct support for a LGS designation for all of the land, the changes were unanimously approved by their elected representatives at the RBC Strategic Planning Committee in August 2024. At the full Council meeting, the land protection was also supported by all 3 parties, with local councillors speaking in favour on behalf of their wards: indeed, the Liberal Democrats declined to approve the Partial Plan Update purely on the basis that full LGS had not been given to this land. The MP for Reading West and Mid Berkshire is also fully supportive of protecting this land as LGS, based on the expressed views of her constituents.
- 5) In privileging the evidence provided by the landowner’s ecologist, RBC have ignored the substantial amount of evidence, submitted by local residents and verified by TVERC, of the presence of rich, diverse wildlife (over 100 different species, including several protected and notable species) across all of the land, not just the 0.46ha deemed to be of greatest importance.
- 6) RBC have ignored the expert opinions of TVERC, CPRE England, BBOWT, Badgers Trust and the Woodland Trust, all of whom support the designation of the entirety of WR3s and WR3t as LGS and/or Local Wildlife Site.
- 7) As confirmed by the Badgers Trust and local evidence, badgers forage over a wide area to obtain sufficient food. It is therefore flawed environmental reasoning to suggest that small, fragmented areas of land of the ‘greatest importance for wildlife’ would suffice to support the diversity of wildlife that lives, hunts, forages and shelters across the entirety of the land on Kentwood and Armour Hills (and the adjoining allotments, nearby parks and private gardens). As protected species, sensitive to human activity, badgers need better protection than that afforded by an additional 0.46ha buffer allocated as LGS.
- 8) It is also unsound environmental reasoning to favour one protected species (badgers) over the many others, such as bats and birds, which have been regularly sighted (with evidence submitted to TVERC) in and around the builders yard and remaining sections of WR3s and WR3t, where they predominantly nest and roost.
- 9) We assert that the designation of the builders yard as brownfield land is unsound, given that the various structures there - sheds and lock-ups - are all temporary in nature; none has proper foundations, mains electricity or planning permission. There are veteran trees with TPOs in this area and sightings of numerous animal species. It would be relatively straightforward to rewild this area, to enhance the existing foraging and roosting habitat for wildlife.
- 10) There is also a striking and, we argue, unsound disparity between the evidence required to justify a LGS designation for WR3s and WR3t, compared with that required for the proposed new LGS designation of the Ibis Sports Club (EN7Ww). EN7Ww are playing fields, privately owned and with no general public access. Only 4 members of the public

have written in to support the designation of EN7Ww as LGS, compared with nearly 70 for WR3s and WR3t; nor has there been any campaign of local people or local public meeting. It is hard to see how the “demonstrably special” LGS criterion has been met for EN7Ww, when compared with WR3s and WR3t. Whereas playing fields exist elsewhere in the vicinity of EN7Ww, sites WR3s and WR3t are the only fully protected refuge sites for wildlife in an otherwise largely built-up area.

- 11) Local Wildlife Site designation. On the basis of trail camera, echolocator, audio, photographic and other evidence provided by local residents, both TVERC’s Berkshire Biodiversity Officer and RBC’s own ecologist agreed in early 2023 that the criteria for WR3s and WR3t being designated as a Local Wildlife Site have been met. TPLC, the landlords, have to date refused TVERC access to the land, to complete the verification process which would confirm its status – and consequent protection - as a Local Wildlife Site.
- 12) The Charity’s refusal of access to an independent ecologist also means that no survey of flora has been conducted, meaning there may well be important plant as well as wildlife species across the land. While LWS status would without doubt confirm the significance of the whole area for wildlife and thereby afford protection from development, this should not preclude Local Green Space status being granted in the meantime, in recognition of the land’s ‘demonstrably special’ importance to the local community.

All of the land at WR3s and WR3t is demonstrably special to the local community, on the basis of the richness of its wildlife and flora inter alia, and we assert that it should therefore be protected from residential development in its entirety. A representative of *Keep Kentwood Green* would like to speak, on behalf of the local community and in favour of the LGS designation, at the Public Hearing when the Partial Update of RBC’s Local Plan will be debated.

Kemp, Helen

Rejwerska, Marcelina

From: Helen Kemp
Sent: 09 November 2024 11:57
To: Planning Policy
Subject: Local plan consultation

Warning!

For the attention of
RBC, BFC Staff and Councillors

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Totally understand the need to provide more housing, but one would hope it would be considered and empathetic not cramming new developments into already densely populated areas such as the Oxford Road.

It seems that Reading Borough Council is determined to turn Reading into a dormitory town, which is serves commuters from Monday to Friday with these same commuters going elsewhere at the weekends because the town offered so little in the by way of enjoyment for leisure such as culture and entertainment.

I write this out of frustration, knowing that these comments are likely to fall on deaf ears as is usual with the Council.

Helen Kemp



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Kidmore End Parish Council

KIDMORE END PARISH COUNCIL

R F Penfold MBE

Clerk of the Council

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13 December 2024

Dear Sirs

READING LOCAL PLAN PRE-SUBMISSION DRAFT UPDATE

My Council has considered the Reading Local Plan Pre-Submission Draft Update, on which your Council invited comments last month. My Council, covering an area in Oxfordshire, just north of the Borough, comments as set out below.

The Council supports the Biodiversity Policy EN12(i), and the new policy EN19(i). However, it has concerns about 8.2.1d. The Council does not support provision of a new Thames crossing east of Reading. The Council supports 8.2.1c, proposed mobility hub capacity on A4155, A4074 and B481, and 8.2.1e which aims at preserving areas of landscape, including the edge of the Chilterns National Landscape.

On 8.2.5, the Council acknowledges that Caversham does not possess adequate infrastructure to support additional development, particularly regarding transport, education and healthcare. The Council does not agree with the wording of your Council's policy, which does not reflect the current opinions of councils north of Reading:

"The Council is working constructively with Wokingham Borough Council, Oxfordshire County Council, South Oxfordshire District Council, local parish and town councils, Transport for the South East, National Highways and the Department for Transport and the Thames Valley Berkshire LEP to work up proposals for additional crossing capacity of the cross- Thames travel, although any proposal additional crossing capacity would be likely to be largely within neighbouring authorities. An additional crossing could result in measures to increase public transport capacity on existing crossings, which would improve traffic issues. The Council continues to explore opportunities for new park and ride mobility hub sites within neighbouring authorities to help alleviate some of the issues identified."

This Council remains opposed to any plans for additional crossing capacity of cross- Thames travel. Your Council's Plan states:

“4.5.8 River Thames Travel. The River Thames is a major barrier to movement, meaning that the existing bridges in the immediate Reading area (Reading, Caversham and Sonning Bridges) are under pressure at peak times. Reading is currently working with Wokingham Borough Council, Oxfordshire County Council, South Oxfordshire District Council, National Highways, the Department for Transport, Transport for the South East, and Local Parish and Town Councils and the two Local Enterprise Partnerships to identify measures to improve the situation. This may involve an additional crossing. The most likely route for such a crossing would be within Wokingham and South Oxfordshire, but if the work identifies a need for use of land within Reading, this should be taken into account. Mitigation on the road network on either side of a bridge may be required.”

Whilst my Council agrees that the Thames is a barrier to movement, it question how an additional Thames crossing east of Reading will mitigate congestion in Caversham. The Council remains opposed to an additional bridge crossing the Thames.

My Council is also concerned that changes in the National Planning Policy Framework (December 2023) are not reflected in the update. In particular, the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Yours faithfully

R F PENFOLD

Clerk of the Council

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By e-mail only